

UNITED STATES DISTRICT COURT

for the
Western District of Washington

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)
Information Associated with Target Telephones 1, 4, and
7, More Fully Described in Attachments A1 and A2

Case No. MJ22-226

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Information associated with Target Telephone 1, more fully described in Attachment A1, and Target Telephones 4 and 7, more fully described in Attachment A2, incorporated herein by reference.

located in the Southern District of Florida; New Jersey, there is now concealed (identify the person or describe the property to be seized):

See Attachments B1 and B2, attached hereto and incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

8 U.S.C. § 1324

18 U.S.C. §1956(a)(1), (h)

Offense Description

Bringing in and Harboring Certain Aliens, and Conspiracy to Commit Such
Offenses; Laundering of, and Conspiracy to Launder, Monetary Instruments

The application is based on these facts:

- ☒ See Affidavit of Special Agent David J. Spitzer, attached hereto and incorporated herein by reference.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.



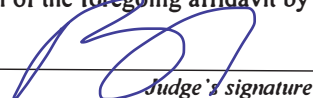
Applicant's signature

DAVID J. SPITZER, Special Agent, HSI

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: May 20, 2022



Judge's signature

City and state: Seattle, Washington

HON. BRIAN A. TSUCHIDA, United States Magistrate Judge

Printed name and title

1 3. I make this affidavit in support of an application for search warrants under
2 Federal Rule of Criminal Procedure 41 and 18 U.S.C. §§ 2703(c)(1)(A) for information
3 about the location of the following cellular telephone(s) (hereinafter, the “Target
4 Telephone(s)”):

5 a. (916) 616-2319 (hereinafter “Target Telephone 1” or “TT1”). TT1 is
6 a cellular telephone with International Mobile Subscriber Identity (IMSI)
7 311480380560254, with subscriber “Info Update,” at 295 Parkshore Drive, Folsom, CA,
8 with service provided by Verizon, a wireless telephone service provider headquartered at
9 180 Washington Valley Road, Bedminster, NJ 07921. TT1 is described herein and in
10 Attachment A1, and the location information to be seized is described herein and in
11 Attachment B1.

12 b. (253) 750-1721 (hereinafter “Target Telephone 4” or “TT4”). TT4 is
13 a cellular telephone with International Mobile Subscriber Identity (IMSI)
14 310410206907647, with subscriber “PREPAID CUSTOMER,” at 123 Your Street, Your
15 Town, GA 98022, with service provided by AT&T, a wireless telephone service provider
16 headquartered at 11760 U.S. Highway 1, North Palm Beach, FL 33408. TT4 is described
17 herein and in Attachment A2, and the location information to be seized is described herein
18 and in Attachment B2.

19 c. (360) 778-9649 (hereinafter “Target Telephone 7” or “TT7”). TT7 is
20 a cellular telephone with International Mobile Subscriber Identity (IMSI)
21 310410370678979, with subscriber “PREPAID CUSTOMER,” at 123 Your Street, Your
22 Town, GA 98409, with service provided by AT&T, a wireless telephone service provider
23 headquartered at 11760 U.S. Highway 1, North Palm Beach, FL 33408. TT7 is described
24 herein and in Attachment A2, and the location information to be seized is described herein
25 and in Attachment B2.

26 4. This is the fourth application in this judicial district for a search warrant
27 authorizing disclosure of the above information for Target Telephone 1. This is the second
28 application in this judicial district for a search warrant authorizing disclosure of the above

1 information for Target Telephone 4. This is the first application in this judicial district for
2 a search warrant authorizing disclosure of the above information for Target Telephone 7 in
3 connection with this investigation.

4 5. The facts set forth in this Affidavit are based on my own personal knowledge;
5 knowledge obtained from other individuals during my participation in this investigation,
6 including other law enforcement officers; interviews of cooperating witnesses; review of
7 documents and records related to this investigation; communications with others who have
8 personal knowledge of the events and circumstances described herein; and information
9 gained through my training and experience.

10 6. Based on the facts set forth in this affidavit, there is probable cause to believe
11 that violations of 8 U.S.C. §§ 1324(a)(1)(A)(i)-(iii), (v)(I) and (a)(2)(B)(ii), Bringing in
12 and Harboring Certain Aliens,¹ and Conspiracy to commit such offenses, and 18 U.S.C. §§
13 1956(a)(1), and (h), Laundering of, and Conspiracy to Launder, Monetary Instruments
14 (hereinafter referred to collectively as “Target Offenses”), have been committed, are being
15 committed, and will be committed by Rajinder Pal SINGH, aka Jaspal GILL,² and other
16 known and unknown. There is also probable cause to believe that the location information
17 described in Attachments B1-B2 will constitute evidence of these criminal violations and
18 will lead to the identification of individuals who are engaged in the commission of these
19 offenses.

20 ECPA

21 7. The Court has jurisdiction to issue the proposed warrants under the
22 Electronic Communications Privacy Act (ECPA), 18 U.S.C. §§ 2701-2713, because it is a
23

24 ¹ The word “alien” is used in Title 8 of the United States Code. Throughout this affidavit, and
25 consistent with Executive Branch policy, when referencing offenses as defined in Title 8 of the
26 United States Code, the author uses the term “alien,” when not referring specifically to Title 8 of
27 the United States Code, the term “noncitizen” is used in lieu of the term “alien.”

28 ² To avoid confusion due to other individuals listed in this affidavit with the last name SINGH, in
this affidavit, Rajinder Pal SINGH—the main target of this investigation—will be referred to by
his alias Jaspal GILL.

1 “court of competent jurisdiction” as defined in 18 U.S.C. § 2711. Specifically, the Court is
 2 the Western District of Washington, a district court of the United States that has jurisdiction
 3 over the offense being investigated, *see* 18 U.S.C. § 2711(3)(A)(i).

4 8. **Through this application, the United States does not request and does**
 5 **not seek to obtain the contents of any communications, as defined in 18 U.S.C.**
 6 **§ 2510(8).**

7 **BACKGROUND ON UNDOCUMENTED NONCITIZEN SMUGGLING**
 8 **ORGANIZATIONS**

9 9. I know from training and experience that 8 U.S.C. § 1324(a)(1)(A)(i) makes
 10 it illegal to bring, or attempt to bring, an alien to the United States in any matter whatsoever
 11 other than at a designated port of entry or a place other than as designated by the Secretary
 12 of the Department of Homeland Security. I also know that this section applies regardless
 13 of whether an undocumented noncitizen has received prior official authorization to come
 14 to, enter, or reside in the United States.

15 10. I also know that under 8 U.S.C. § 1324(a)(1)(A)(ii) it is illegal to knowingly
 16 or in reckless disregard of the fact that an alien has come to, entered, or remains in
 17 the United States in violation of law, to transport, or attempt to transport, such alien in
 18 order to help the alien remain in the United States illegally.

19 11. In addition, I know that under 8 U.S.C. § 1324(a)(1)(A)(iii) it is illegal to
 20 knowingly or in reckless disregard of the fact that an alien has come to, entered, or remains
 21 in the United States in violation of law, to harbor, or attempt to harbor, such alien, with the
 22 intent to violate the law.

23 12. I further know that under 8 U.S.C. §§ 1324(a)(1)(A)(v)(I), (II) it is unlawful
 24 to conspire to commit, or aid or abet the commission of the crimes listed in 8 U.S.C. §§
 25 1324(a)(1)(A)(i)-(iii).

26 13. Finally, I know that under 8 U.S.C. § 1324(a)(2)(B)(ii) it is illegal to
 27 knowingly or in reckless disregard of the fact that an undocumented noncitizen has not
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1 received prior official authorization to come to, enter, or reside in the United States, bring
2 or attempt to bring to the United States whatsoever, such alien for private financial gain.

3 14. From my training and experience as an HSI Special Agent, I know that
4 undocumented noncitizens who cannot secure non-immigrant or immigrant visas to
5 lawfully enter the United States generally choose instead to enter the United States illegally
6 between the ports of entry on the southern and northern borders.

7 15. Because of their general unfamiliarity with the terrain and border
8 environment or with the methods and routes used to successfully cross the border without
9 detection by government officials, undocumented noncitizens seeking to enter the United
10 States without inspection frequently hire individuals, known as smugglers, who have
11 experience bringing individuals into the United States without detection.

12 16. Several undocumented noncitizen smuggling organizations operate in the
13 lower mainland of British Columbia, Canada. These organizations typically charge
14 undocumented noncitizens between \$2,000 and \$5,000 (USD) to be illegally brought
15 across the U.S. border. Fees charged by these organizations vary on different factors. This
16 can include if an undocumented noncitizen is housed by the organization during their
17 illegal border crossing, or if the organization transports the undocumented noncitizen a
18 significant distance during the illegal entry. The relative risk of the route used to enter the
19 U.S. is also a factor that can affect the fee.

20 17. Undocumented noncitizen smuggling organizations operating in the lower
21 mainland of British Columbia typically have U.S. associates who pick up the
22 undocumented noncitizens once they cross the border illegally. These U.S. associates
23 typically transport the undocumented noncitizens to the Seattle area, where associates may
24 then assist the undocumented noncitizens with travel arrangements to other U.S. locations.
25 These undocumented noncitizen smuggling organizations may assist in facilitating a driver
26 to transport undocumented noncitizens to other states, as many illegal entrants lack the
27 identification required to travel by air or other mass transportation.
28

1 18. Many of these undocumented noncitizen smuggling organizations work with
2 individuals known as “brokers”, who arrange travel for the undocumented noncitizens from
3 their home countries through various transit nations into the U.S. for fees ranging from
4 \$30,000 to \$70,000 (USD). These brokers will often also arrange for fraudulent travel and
5 identification documents to facilitate the undocumented noncitizen’s travel.

6 **SUMMARY OF THE INVESTIGATION**

7 19. In 2018, Homeland Security Investigations (HSI) Blaine began investigating
8 a non-citizen smuggling organization that was suspected of smuggling non-citizens into
9 the United States through the U.S. – Canada border in Whatcom County, Washington.
10 Through the course of this investigation, investigators have determined that beginning no
11 later than Summer 2018, the smuggling organization has used, and continues to use, Uber
12 drivers to transport undocumented noncitizens from the U.S. – Canada border to various
13 locations in the greater Seattle area.

14 20. Based upon records provided by Uber, investigators observed a pattern
15 associated with the Uber trips involving the transportation of non-citizens that were being
16 smuggled by the organization. Specifically, investigators noted that the Uber trips would
17 consist of two legs. The first leg of the trip would originate from near the U.S. – Canada
18 border and would terminate at an intermediate location—most often the Seattle-Tacoma
19 International Airport. The second leg would then commence from the vicinity of the prior
20 drop-off location and would terminate near a suspected stash house in Kent, WA, at a strip
21 mall parking lot in Lacey, WA, or at motels in the greater Seattle-area.

22 21. Of note, Daljit KAUR—GILL’s spouse—is the owner of a property located
23 at 2743 Fiddleback St. NE, Lacey, WA, (hereinafter, “the Lacey Residence”) that
24 investigators believe GILL has used as a location to house smuggled non-citizens prior to
25 further transportation throughout the United States. Specifically, in July 2021, August
26 2021, and September 2021, via video and/or in-person surveillance, GILL was observed
27 dropping off suspected smuggled non-citizens at a gas station in Lacey, WA (July 2021),
28

1 or picking-up suspected smuggled non-citizens and transporting them back to the Lacey
2 Residence (August and September 2021).

3 22. Moreover, in the days prior to the July 2021 suspected smuggling event,
4 investigators located multiple split Uber trips—that originated near the U.S. – Canada
5 border and terminated in Lacey, WA. For the suspected smuggling events in August and
6 September 2021, investigators conducted surveillance of the Uber trips while in progress.

7 23. In the past several months, investigators have advanced this investigation by
8 obtaining additional process from Uber, credit card records from Capital One, and GPS
9 ping warrants for the digital devices/call numbers associated with the Uber accounts being
10 used by the smuggling organization.

11 24. Of note, records from Capital One show that a credit card in the name of
12 “Jaipaul Singh,”³ with a billing address of 10074 Dona Neely Way, Elk Grove, CA, and
13 owned by Daljit KAUR (hereinafter “the Elk Grove Residence”), purchased airfare for
14 individuals that GILL smuggled into the United States in January 2022. The airfare
15 purchased was for K.P. (Seattle to Nashville) on January 25, 2022, and J.C. (Seattle to
16 Chicago) on January 26, 2022.

17 25. Investigators located split Uber trips on both January 25, 2022, and January
18 26, 2022, that appear to correlate with these flights. Specifically, the first leg of each trip
19 originated in the early morning hours near the U.S. – Canada border and was split at the
20 Seattle-Tacoma International Airport (hereinafter “Sea-Tac Airport”). After the trip was
21 split a Sea-Tac Airport, the second leg of the trip continued to the Century Motel in Kent,
22 WA. Later in the same day, investigators then noted an apparent third leg of the trip from
23 the Century Motel back to the Sea-Tac airport.

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25
26 ³ Investigators believe this name to be an alias of GILL. A Bank of America (BoA) account
27 previously identified during this investigation also used the name of Jaipaul Singh. This bank
28 account, which was closed in October 2021, had an associated phone number of TT1 and an
address of the Galt Residence. This BoA account was used to pay 10 of the 114 payments during
the requested period on the Capital One credit card.

1 26. Based upon recorded communications between GILL and an HSI
2 cooperating source (referred to in prior applications and herein as “CS-2”⁴), investigators
3 confirmed that GILL smuggled K.P. and J.C. into the United States as indicated above.
4 According to these recorded communications, GILL’s fee for smuggling these two
5 individuals into the United States was \$11,000 per person / \$22,000 total.

6 27. Throughout April 2022, investigators conducted joint operations with other
7 DHS components near the U.S. – Canada border in the Western District of Washington.
8 Specifically, on April 21, April 26, and April 27, 2022, U.S. Border Patrol agents
9 apprehended ten Indian nationals shortly after they had illegally entered the United States
10 from Canada. Based upon the review of Uber records, GPS ping information, PR/TT data,
11 and surveillance video at a Walgreens in Elk Grove, CA—and as further explained
12 herein—investigators linked each of these smuggling events to GILL. Moreover, based
13 upon GPS location information, investigators believe that GILL conducted each of these
14 smuggling events from the Elk Grove Residence.

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16
17 ⁴ CS-2 has been an HSI source of information, and later a confidential informant, since Summer
18 2021. CS-2 was previously identified as a target of this investigation and some of his/her activities
19 in support of the smuggling organization are detailed in this affidavit. CS-2 is cooperating with the
20 government in the hope of receiving prosecutorial consideration. CS-2 has a criminal history
21 related to his/her unlawful entry into the United States. CS-2 is subject to an outstanding order of
22 removal issued by an immigration judge, *in absentia*, under a different and false name that CS-2
23 had provided to USBP upon his initial apprehension in 2003. Due to his/her cooperation in this
24 investigation, CS-2 was receiving deferred action from HSI. In March 2022, CS-2 was granted an
25 immigration benefit that could ultimately lead to lasting status and relates to an application that
26 was submitted prior to CS-2’s involvement with HSI and this investigation. However, his/her prior
27 participation in the smuggling organization’s activities could detrimentally affect CS-2’s ability to
28 receive a lasting immigration benefit.

CS-2 has not previously been a confidential informant with HSI or any other law enforcement
agency. During the time that CS-2 has been cooperating with HSI in this investigation, CS-2 has
provided actionable information related to the smuggling organization’s activity, which has
resulted in several arrests of undocumented noncitizens subsequent to their unlawful entry into the
United States. Based on these arrests, and other background information related to subjects of
investigation—some of which, but not all of which agents have been able to externally
corroborate—the information provided by CS-2 has been shown to be reliable.

28. Furthermore, in the month of April 2022, investigators observed—via remote video surveillance—two separate groups of suspected noncitizens entering the garage of the Lacey Residence owned by Daljit KAUR. For each of these suspected smuggling events, investigators were able to locate a split Uber trip that originated at the border and terminated within .2 miles of the Lacey Residence. For each of these two suspected smuggling events in April 2022, GPS location data placed GILL at the Elk Grove Residence at the time of these events.

PROBABLE CAUSE

A. Identification of Smuggling Organization and Target of Investigation Rajinder Pal SINGH, aka Jaspal GILL

29. In 2018, Homeland Security Investigations (HSI) Sacramento received information from Amtrak Investigations regarding suspicious activity related to an Amtrak member profile that was set up using the email account, singhmola7@gmail.com (hereinafter referred to as “Amtrak Account”). HSI learned that user behind that Amtrak Account had spent more than \$90,000 to purchase tickets for groups of Indian nationals traveling mostly from Washington State to Naperville, IL, a suburb of Chicago. These tickets were purchased using billing names that included Jaypaul SINGH and Jaspal GILL with multiple billing addresses, including 11810 127th Street East in Puyallup, WA.

30. As indicated above, Jaspal GILL is a known alias of Rajinder Pal SINGH. A search of Washington state records revealed a driver license in the name of Jaspal GILL (GILL*J*227LE) and an address of 11810 127th Street Ct E in Puyallup, WA. This license was first issued on April 27, 2012, reissued on November 21, 2015, but according to Washington State records was subsequently cancelled. The two driver’s license photos associated with this driver’s license appear to be a match to GILL—based both on other photographs that I have viewed of GILL and physical surveillance that I have conducted of GILL.

31. Another name associated with the Amtrak Account was Daljit KAUR, with a corresponding billing address of 9989 Springview Way, Elk Grove, CA. Based upon

1 reports authored by other law enforcement officers relating to this case, I know that this is
2 a name and address match to the common law⁵ spouse of GILL.

3 32. On January 17, 2018, Amtrak investigators notified U.S. Immigration and
4 Customs Enforcement (ICE) and the Naperville Police Department of a train that was set
5 to arrive that day in Naperville, IL, with many passengers whose tickets had been booked
6 by the Amtrak Account. Upon arriving, a group of approximately ten individuals, who
7 appeared to be on Indian descent, were observed disembarking from the train. These
8 individuals were traveling with either no personal belongings or, at most, a backpack.

9 33. After the group split up, a Naperville Police Department officer initiated a
10 traffic stop on a vehicle in which one of the suspected undocumented noncitizens was an
11 occupant. The passenger, a female named V.P., refused to answer questions of officers
12 related to her immigration status and was later released from the scene. Further record
13 checks were conducted by HSI SA Dylan Critten that revealed that V.P. was previously
14 refused a United States visitor visa and there was no record of her having been lawfully
15 admitted into the United States.

16 34. According to Amtrak records, the bookings associated to the Amtrak
17 Account used Internet Protocol (IP) address 73.221.131.24, as well as other IP addresses.
18 On February 9, 2018, SA Critten served Comcast Communications with an administrative
19 subpoena for records pertaining to IP address 73.221.131.24.

20 35. On February 20, 2018, Comcast responded to the subpoena. According to the
21 records provided, between January 1, 2018, and February 9, 2018, the subscriber of record
22 for the requested IP address was Jaspaul GILL with a service address of 623 Eastside St.
23 SE, Apt. 404, Olympia, WA.

24
25
26 ⁵ I use this term because I am not certain that GILL and KAUR are in fact married, under either
27 Indian or U.S. law. However, based upon my investigation in this case, to include law enforcement
28 reports from 2003 and 2008, I know that GILL and KAUR are the parents of at least two children
and have shared the same household.

1 36. On March 26, 2018, a public-records search by SA Critten for the address
2 located at 623 Eastside St. SE, Apt. 404 in Olympia, WA, returned results for both “Jaypaul
3 SINGH” and “Jaspaul GILL.”

4 37. While conducting a criminal record search on GILL, it was determined that
5 on August 1, 2003, in the District of Oregon, GILL was convicted of 18 U.S.C. § 1540
6 (False Statements in Application for U.S. Passport) and 18 U.S.C. § 1344 (Bank Fraud),
7 sentenced to twenty-one months in prison, and ordered to pay restitution of more than
8 \$290,000. On July 13, 2009, in the Western District of Washington, GILL was convicted
9 of 8 U.S.C. § 1326(b)(2) (Illegal Reentry After Deportation) and 18 U.S.C. § 1344 (Bank
10 Fraud), sentenced to twenty-seven months in prison, and ordered to pay restitution of
11 approximately \$15,000. On January 3, 2011, following service of his sentence on the above
12 charges, GILL was deported from the United States and returned to India.

13 38. According to records provided to law enforcement by Chase, a checking
14 account in the name of Jaspal GILL, with an address of 11810 127th Street Ct E, Puyallup,
15 WA, was opened in Federal Way, WA, on January 4, 2012.

16 39. On September 18, 2018, an Amtrak representative confirmed to SA Critten
17 that there had been no more reservations purchased using the singhmola7@gmail.com
18 email address after January 16, 2018.

19 40. On April 4, 2019, through a search of the Thurston County Assessors
20 website, HSI SA Jason Montgomery learned that Daljit KAUR had purchased 2743
21 Fiddleback St. NE, Lacey, WA, *i.e.*, the Lacey Residence, in February 2019. Additionally,
22 based upon additional open-source checks, SA Montgomery found a utility record under
23 the name Jaspaul GILL for the Lacey Residence. The phone number listed on that utility
24 record was (916) 616-2319, *i.e.*, the call number associated with TT1.

25 41. According to records provided by Verizon on January 27, 2022, TT1 is a
26 prepaid account with a subscriber listed as “Info Update” and an address of 295 Parkshore
27 Drive, Folsom, CA. An open-source search of that address reveals that it is a Verizon office
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1 building. The subpoenaed information also revealed that TT1 has been active with the same
2 subscriber since January 28, 2018.

3 **B. Identification of Smuggling Organization's Use of Uber to Transport**
4 **Undocumented Noncitizens from U.S. – Canada Border**

5 42. In July 2018, independent of the above-noted HSI Sacramento investigation
6 relating to purchase of train fares by the Amtrak Account, HSI Blaine initiated an
7 investigation into the increased apprehensions by USBP of foreign nationals crossing
8 illegally into the United States from Canada between the designated ports of entry in
9 Whatcom County, WA.

10 43. Information obtained through the investigation indicates that beginning no
11 later than Summer 2018, GILL and the smuggling organization began using Uber drivers
12 to transport undocumented noncitizens from the U.S. – Canada border to various locations
13 in the greater Seattle area.

14 44. On October 4, 2018, Border Patrol agents observed a dark gray⁶ 2015 Toyota
15 Camry with Washington license plate BGB5468 (hereinafter “the Camry”) pick up four
16 individuals who had crossed into the United States illegally near Lynden, WA.

17 45. Border Patrol agents stopped the Camry and interviewed the driver,
18 Ramandeep Singh Johal. Johal stated that he was an Uber driver and said that he was at
19 home when he received an alert on his Uber application for a fare. Johal told Border Patrol
20 agents that this was the first time he had picked up a fare that close to the border. Johal said
21 that after the Border Patrol stopped the Camry, the man in the Camry's passenger seat told
22 Johal that the group had crossed the border illegally.

23 46. U.S. Border Patrol agents also interviewed the four passengers inside the
24 Camry, and determined these individuals were Indian citizens and did not have the required
25 immigration documents to be in the United States legally.

26
27 ⁶ Prior warrant applications described this vehicle as black, but upon further visual surveillance,
28 its color is more appropriately described as dark gray.

1 47. Uber records, received in October 2018, show that Johal and the Camry made
2 more than a dozen early-morning trips from addresses in Lynden and Nooksack, WA, to
3 Sea-Tac Airport between late September 2018 and early December 2018. These trips
4 occurred between 1:53 a.m. and 5:23 a.m.

5 48. On November 16, 2018, U.S. Magistrate Judge Paula L. McCandlis
6 authorized the government to install a GPS tracking device on the Camry. GJ18-603 (W.D.
7 Wash. Nov. 16, 2018). Agents installed a tracker on the Camry on November 19, 2018.

8 49. On December 3, 2018, at 2:05 a.m., HSI Blaine conducted electronic
9 surveillance of the Camry as it left 1861 Emerald Lane, Lynden, WA. According to the
10 court-authorized GPS tracker, at 2:10 a.m., the Camry stopped briefly on Berthusen Road
11 in Lynden, WA, approximately four miles south of the U.S. – Canada border. HSI Blaine
12 continued electronic surveillance of the Camry as it traveled directly to Sea-Tac Airport,
13 roughly 115 miles from Lynden.

14 50. Once the Camry arrived at the airport, Supervisory Special Agent (SSA) Loic
15 Gunn observed four occupants—two men of apparent Indian descent, one woman of
16 apparent Indian descent, and a young child—get out of the vehicle near the American
17 Airlines departure drop-off area.

18 51. SSA Gunn maintained surveillance on foot as these four individuals left the
19 drop-off area and walked downstairs to the arrival's concourse. The individuals then
20 walked away from the airport to Pacific Highway South.

21 52. SA Brian Faria then observed these four individuals cross Pacific Highway
22 South to the parking lot of the Radisson Hotel Seattle Airport (hereinafter "Radisson Sea-
23 Tac"), where they were picked up by a silver 2017 Toyota Prius bearing Washington
24 license plate number BFG8375 (hereinafter "the Prius"), registered to Ajeet Singh, at
25 11221 SE 240th Place, Kent, WA⁷ (hereinafter "the Kent Residence"). Based on
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27 ⁷ Based on surveillance and information gathered throughout this investigation, investigators
28 believe this address used to be a stash house for undocumented noncitizens who were smuggled

1 subsequent physical surveillance and a review of identity documents, law enforcement
2 believes that the driver of the Prius was in fact Ajeet Singh.

3 53. HSI Blaine and Seattle agents continued surveillance of the Prius as it drove
4 to the Econo Lodge hotel at 1233 Central Ave., Kent, WA, arriving at 4:36 a.m. Once at
5 the Econo Lodge, the occupants of the Prius, including Singh, entered Room 108. Five
6 minutes later, Singh left Room 108 by himself and departed the hotel in the Prius.

7 54. Singh returned to the hotel in the Prius around noon. Agents watched him
8 enter Room 108 with a small plastic grocery bag. Five minutes later, Singh left the room
9 and entered the hotel lobby. Singh returned to Room 108 before departing in the Prius at
10 12:15 p.m.

11 55. At 10:18 p.m., agents observed Singh return to the hotel in the Prius. A few
12 minutes later, the four occupants—two men, a woman, and a child—left the room and got
13 into the Prius. Singh parked near the lobby and went inside for several minutes before
14 exiting the lobby with papers in his hand. Singh reentered the Prius and drove the
15 passengers to the Kent Residence without stopping. Agents saw the Prius enter the
16 residence's attached garage.

17 56. A review of records provided by Uber, shows that the Malik Sen was the
18 Uber customer who ordered the December 3, 2018, Uber trip detailed above. A further
19 analysis of records provided by Uber show that from September 28, 2018, through
20 December 31, 2018, the Malik Sen Uber Account booked twenty-four additional trips from
21 Lynden and Nooksack, WA, to Sea-Tac Airport. Significantly, the last trip on December
22 31, 2018, with a pick-up in Lynden, WA, and a planned destination of Sea-Tac Airport,
23 resulted in the apprehension of five undocumented citizens by USBP in Bellingham, WA.

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27 into the United States prior to being transported by the smuggling organization to various locations
28 throughout the United States. However, since early 2020, the investigation has revealed that the
organization no longer uses this location.

C. Identification of Straw Uber Accounts and Uber Trip-Splitting as Means of Obfuscating Trip Origin

57. Throughout the course of this investigation, HSI has identified at least seventeen Uber accounts used by the smuggling organization. Through various legal processes, Uber has provided phone numbers associated with each of these Uber accounts. HSI has been able to determine, through subpoena requests to various service providers, that the phone number associated with each of these seventeen Uber accounts has service via a prepaid wireless account.⁸

58. Though investigators have identified seventeen Uber accounts that are believed to have been used by the organization since the inception of the investigation in 2018, according to records provided by Uber through May 5, 2022,⁹ investigators believe that many of these accounts are no longer in use by the organization. However, at least four of these Uber accounts were active through at least April 25, 2022. These four accounts are:

Uber Account Name	Phone Number Associated with Account
Sam Thakur / Uber Account 1	916-616-2319 / TT1
Dave Maer / Uber Account 2	360-303-0806 / TT2
Dhiren Paras / Uber Account 3	916-513-3602 / TT3
Avr Suri / Uber Account 5	628-224-5202 / TT5

Sam Thakur / Uber Account 1

59. According to records provided by Uber on May 5, 2022, an account with the

//

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⁸ Based on my training and experience, I know that use of prepaid wireless cellular accounts is a common tactic used by criminals who are attempting to evade law enforcement detection, as these accounts typically would not require verifiable subscriber/account holder information such as name and/or address.

⁹ MJ22-189 (W.D. Wash. May 2, 2022).

1 user-name Sam Thakur (Uber Account 1)¹⁰ was created on February 4, 2018, and was
 2 active as of the date that Uber provided the records. As of the date of the return, the digital
 3 device associated with Uber Account 1 was an Apple iPhone 11¹¹ with service by Verizon.
 4 The billing information was listed as “gift card.” The e-mail address listed on the account
 5 was thakurpur360@gmail.com.

6 60. As detailed below, a review of Uber Account 1 suggests that Uber Account
 7 1 has been used in conjunction with other Uber Accounts to move suspected undocumented
 8 noncitizens from near the U.S. – Canada border to Sea-Tac Airport, and then to the Kent
 9 residence, the Lacey Residence, and other areas known and unknown.

10 61. While Uber Account 1 has never been used to order an Uber trip originating
 11 near the U.S. – Canada border, it has been used repeatedly as a second leg of an Uber trip
 12 that originated near the U.S. – Canada border. Specifically, from September 16, 2018, to
 13 May 29, 2021, at least ninety of the 140 Uber trips ordered by Uber Account 1 originated
 14 at, or near, Sea-Tac Airport, and were ordered within thirty minutes of the termination of
 15 another Uber Trip—ordered by a different Uber account—that ended at, or near, Sea-Tac
 16
 17

18 ¹⁰ In April 2020, Uber provided internet protocol (IP) addresses relating to four Uber accounts,
 19 including Uber Account 1. One of the IP addresses provided, relating to Uber Account 1, was
 20 73.83.98.37 (hereinafter “IP Address 1”). According to these records, IP Address 1 registered with
 21 Uber servers twenty-two times from January 9, 2020 (UTC), through February 11, 2020 (UTC).
 According to Comcast records, during these dates, IP Address 1 was associated with service at the
 Lacey Residence, with GILL as the subscriber.

22 Another IP address associated with Uber Account 1 was 98.255.185.2 (hereinafter “IP Address
 23 2”). According to Uber records, IP Address 2 registered with Uber servers 324 times from January
 2, 2020 (UTC), through March 31, 2020 (UTC). According to Comcast records, during these dates,
 24 IP Address 2 was associated with service at the Elk Grove Residence with Daljit KAUR as the
 subscriber.

25 In September 2021, Uber provided additional records relating to IP addresses associated with Uber
 Account 1. According to these records, IP Address 1 again registered with Uber servers on
 26 September 8, 2021 (UTC). According to Comcast records received, on September 8, 2021, IP
 Address 1 was still associated with service at the Lacey Residence, with GILL as the subscriber.

27 ¹¹ According to Uber records, the device model shows “iPhone 12,1.” Based on an open-source
 28 search, this nomenclature refers to an iPhone 11.

Airport. As noted, each of these apparent first legs of a split-trip originated near the U.S. – Canada border.

62. The below chart showing trip-splitting¹² at Sea-Tac Airport—with the Sam Thakur/Uber Account 1 always being the second leg—is representative of these ninety trips involving the two separate Uber accounts with trip-splitting at Sea-Tac Airport. Moreover, from January 27, 2020, through April 22, 2022, when Uber Account 1 has been used in conjunction with another Uber account to split a trip at or near Sea-Tac Airport, the first leg of the trip was always ordered by either the Dave Maer Account / Uber Account 2 or the Dhiren Paras Account / Uber Account 3.

	Date	Departure	Origin	Arrival	Destination	Uber Account
Leg 1	9/16/2018	4:36 a.m.	Lynden, WA	6:36 a.m.	Sea-Tac Airport	Nile Bijj
Leg 2	9/16/2018	6:57 a.m.	Radisson Sea-Tac	7:15 a.m.	9620 S. 242nd Ct., Kent, WA ¹³	Sam Thakur / Uber Account 1
Leg 1	1/31/2019	4:32 a.m.	Nooksack, WA	6:34 a.m.	Sea-Tac Airport	Dev Sumer
Leg 2	1/31/2019	6:50 a.m.	Radisson Sea-Tac	7:14 a.m.	11222 SE 240th Pl., Kent, WA ¹⁴	Sam Thakur / Uber Account 1

¹² Based on records provided by Uber, law enforcement's knowledge of this investigation, and the patterns identified herein, investigators believe that members of the organization are splitting trips to obscure the origin of the trip, *i.e.*, the international border, and to provide a potential lack of knowledge defense relating to the immigration status and/or manner of entry of the noncitizens that the organization is smuggling.

¹³ This address is located approximately 1.2 miles from the Kent Residence discussed above in Section B.

¹⁴ This address is located two houses away from the Kent Residence discussed above in Section B.

1	Leg 1	4/11/2019	5:28 a.m.	Lynden, WA	7:50 a.m.	Sea-Tac Airport	Avr Suri / Uber Account 5
2							
3	Leg 2	4/11/2019	8:05 a.m.	Radisson Sea-Tac	8:27 a.m.	10715 SE 240 th St., Kent WA ¹⁵	Sam Thakur/ Uber Account 1
4							
5							
6	Leg 1	1/6/2020	2:19 a.m.	Custer, WA	4:09 a.m.	Sea-Tac Airport	Dave Maer/ Uber Account 2
7							
8	Leg 2	1/6/2020	4:28 a.m.	Radisson Sea-Tac	4:46 a.m.	11211 SE 240th Pl., Kent WA ¹⁶	Sam Thakur/ Uber Account 1
9							
10							
11	Leg 1	1/19/2021	5:27 a.m.	Ferndale, WA	8:04 a.m.	Radisson Sea-Tac	Dave Maer / Uber Account 2
12							
13	Leg 2	1/19/2021	8:09 a.m.	Radisson Sea-Tac	9:11 a.m.	Starbucks Lacey, WA ¹⁷	Sam Thakur/ Uber Account 1
14							
15	Leg 1	5/29/2021	3:38 a.m.	Ferndale, WA	5:31 a.m.	Radisson Sea-Tac	Dhiren Paras/Uber Account 3
16							
17							
18	Leg 2	5/29/2021	5:39 a.m.	Radisson Sea-Tac	6:25 a.m.	2719 Fiddelback St, NE, Lacey, WA ¹⁸	Sam Thakur/Uber Account 1
19							
20							
21							
22							
23							
24							

¹⁵ This address is located approximately .4 miles from the Kent Residence discussed above in Section B.

¹⁶ This address is located across the street from the Kent Residence discussed above in Section B

¹⁷ The drop-off location for this trip is located approximately 2.1 miles from the Lacey Residence discussed above in Sections A and C.

¹⁸ This address is located 180 feet from the Lacey Residence—owned by Daljit KAUR.

63. As indicated above, records provided by Verizon on January 27, 2022, show that the phone number associated to Uber Account 1 is a prepaid account with a subscriber listed as “Info Update” and an address of 295 Parkshore Drive, Folsom, CA. An open-source search of that address reveals that it is a Verizon office building. These records also show that the phone number associated to Uber Account 1—(916) 616-2319, *i.e.*, TT1—has been active, with the same subscriber information associated to it, since January 28, 2018.

Dave Maer / Uber Account 2

64. According to records provided by Uber on May 5, 2022, Uber Account 2 was created on September 27, 2018, in the name of “Vimal Shah.” The account name was changed to “Dave Shah” on January 2, 2019. Less than a minute later, on January 2, 2019, the account name was again changed to “Dave Maer.” As of the date of the return, the digital device associated with Uber Account 2 was an Apple iPhone 6¹⁹ with service by Verizon. The billing information listed a partial account number associated with a “RuPay” (Indian) credit card. The e-mail address listed on the account was fivepal360@gmail.com. The account was active as of the date that Uber provided the records.

65. According to Uber records obtained in February 2022, Uber Account 2 ordered approximately ninety-three Uber trips from January 3, 2019, through February 13, 2022. Significantly, beginning in May 2019, and continuing until October 18, 2021, Uber Account 2 has been used to order thirty-six fares that originated near the U.S. – Canada border and terminated at the Sea-Tac Airport, the Radisson Sea-Tac, or other locations adjacent to Sea-Tac Airport.

66. Moreover, on January 26, 2022, Uber Account 2 and Uber Account 3 were involved in an apparent split-trip that originated near the U.S. – Canada border and terminated at a hotel in Kent, WA. Specifically, Uber Account 3 ordered a trip that

¹⁹ According to Uber records, the device model shows “iPhone 7,2.” Based on an open-source search, this nomenclature refers to an iPhone 6.

1 originated near Badger Road in Lynden, WA, at approximately 4:55 a.m. That trip
2 terminated at the Mariner Park and Ride in Everett, WA (hereinafter “Everett Park and
3 Ride”), at approximately 6:19 a.m. At approximately 6:28 a.m., a trip ordered by Uber
4 Account 2, originated at a Starbuck’s in Everett, WA—that is 500 feet from the Everett
5 Park and Ride. This second leg, ordered by Uber Account 2, terminated at the Century
6 Motel in Kent, WA (hereinafter “Century Motel”), at 7:09 a.m.

7 67. Additionally, beginning on February 9, 2021, and as recently as January 11,
8 2022, Uber Account 2 ordered sixteen trips that originated at the Radisson Sea-Tac. Each
9 of these sixteen trips terminated at one of three locations: a parking lot in Lacey, WA
10 (twelve trips), the Century Motel (two trips), or a Park and Ride in Kent, WA, that is located
11 approximately .2 miles from the Century Motel (two trips).

12 68. Two of these sixteen trips, which occurred on August 30, 2021, and October
13 1, 2021, appear to be split trips from the area near the U.S. – Canada border, with both legs
14 of each trip being ordered by Uber Account 2. Moreover, even though investigators have
15 not yet located the first leg—from the border to Sea-Tac airport—for the other fourteen of
16 these sixteen trips, each of these fourteen trips originated at the Radisson Sea-Tac between
17 4:56 a.m. and 7:43 a.m., which is consistent with a first leg that originated near the U.S. –
18 Canada border in the early morning hours.

19 69. Based upon Uber records through February 23, 2022, the last trip ordered by
20 Uber Account 2 occurred on February 13, 2022. This trip originated at the Century Motel
21 at 12:39 p.m., and terminated at Sea-Tac Airport at 12:52 p.m.

22 70. According to records provided by Verizon on January 27, 2022, the phone
23 number associated with Uber Account 2 is a prepaid account with a subscriber listed as
24 “PHONEINTHEBOX OAS” and an address of 295 Parkshore Drive in Folsom, CA, *i.e.*,
25 the same address listed for the phone number associated with Uber Account 1. According
26 to Verizon records, the phone number associated to Uber Account 2—(360) 303-0806, *i.e.*,
27 TT2—has had the same subscriber since September 26, 2018.

Dhiren Paras / Uber Account 3

71. According to records provided by Uber on May 5, 2022, Uber Account 3 was created on March 21, 2018, in the name of “Montik Vij.” On May 28, 2021, the account name was changed three times in a period of approximately five minutes. The account name was first changed to “Dhiren vij,” then it was changed to “Dhiren Patel,” and finally, the account name was changed to “Dhiren Paras.” Coincident with the name changes on May 28, 2021, a U.S. passport in the name of “Dhiren Patel” was uploaded as the identity document associated with the account. As of the date of the return, the digital device associated with Uber Account 3 was an Apple iPhone 7²⁰ with service by AT&T. The billing information was listed as “gift card.” The e-mail address listed on the account was sooramaa@icloud.com. The account was active as of the date that Uber provided the records.

72. Uber records obtained in February 2022 show that from May 29, 2021, through February 12, 2022, Uber Account 3 ordered a total of fifty trips. Of these fifty total Uber fares, twenty-four have involved trips that originated near the U.S. – Canada border and terminated at the Sea-Tac Airport, the Radisson Sea-Tac, or at a gas station located next to Sea-Tac Airport.

73. One of the twenty-four border trips, which occurred on September 15, 2021, appears to have been in tandem with Uber Account 2. Specifically, the Uber Account 3 border trip terminated at Sea-Tac at 6:34 a.m., with Uber Account 2 ordering a trip that originated at the Radisson Sea-Tac at 6:53 a.m. The second leg of the trip, ordered by Uber Account 2, terminated at the Century Motel at 7:04 a.m.

74. Another one of the twenty-four border trips, which occurred on September 7, 2021, involved trip-splitting with both legs of the trip being ordered by Uber Account 3. Specifically, the first leg of the trip began near the U.S. – Canada border at 5:01 a.m., and

²⁰ According to Uber records, the device model shows “iPhone 9,3.” However, based on an open-source search, this nomenclature refers to an iPhone 7.

ended at 7:24 a.m. at Sea-Tac Airport. The second leg of the trip originated at the Radisson Sea-Tac at 7:44 a.m., and terminated at 8:29 a.m. at the Lacey, WA parking lot—referenced above that is approximately 2.1 miles from the Lacey Residence.

75. In addition to the September 7, 2021, trip noted above, Uber Account 3 ordered another ten trips that originated at the Radisson Sea-Tac. The first of these ten trips occurred on July 15, 2021, and the last was on February 9, 2022. Each of these ten trips terminated at either the Lacey, WA parking lot (five trips) or the Century Motel (five trips).

76. Finally, Uber records show that from October 13, 2021, through January 26, 2022, Uber Account 3 was used to order nine Uber trips that originated near the U.S. – Canada border and terminated at the Everett Park and Ride. Investigators have only been able to identify the second leg of five of these trips, including one involving Uber Account 2 on January 26, 2022, as discussed above.

77. Based upon Uber records through February 23, 2022, the last trip ordered by Uber Account 3 occurred on February 12, 2022. This trip originated near the U.S. – Canada border in Lynden, WA, at 4:06 a.m., and terminated at Sea-Tac Airport at 6:21 a.m.

78. AT&T Wireless records show that the phone number associated to Uber Account 3 is connected to a prepaid account with the subscriber information labeled as “PREPAID CUSTOMER” with an address of 17330 Preston Road in Dallas, TX. An open-source search of this address revealed an office park with one of the offices being registered to AT&T Mobility LLC. Based on information provided by AT&T, the phone number associated to Uber Account 3—(916) 513-3602, *i.e.*, TT3—has been assigned to the same prepaid customer since January 22, 2019.

Avr Suri / Uber Account 5

79. According to records provided by Uber on May 5, 2022, an account with the user-name Avr Suri (Uber Account 5) was created on March 17, 2019, and was active as of the date that Uber provided the records. As of the date of the return, the digital device

1 associated with Uber Account 5 was an Apple iPhone SE²¹ with service by AT&T. The
2 billing information listed included both a “gift card” and a partial account number
3 associated with a Chase Bank USA credit card. The e-mail address listed on the account
4 was sooramaa@icloud.com.

5 80. Uber records obtained in February 2022 show that from March 18, 2019,
6 through February 9, 2022, Uber Account 5 ordered a total of seventeen trips. Of these
7 seventeen total Uber fares, eight have involved trips that originated near the U.S. – Canada
8 border and five of those terminated at the Sea-Tac Airport.

9 81. One of the eight border trips, which occurred on February 2, 2022, appears
10 to have been in tandem with Uber Account 3. Specifically, the Uber Account 5 border trip
11 terminated at Sea-Tac at 3:21 a.m., with Uber Account 3 ordering a trip that originated at
12 the Radisson Sea-Tac at 3:43 a.m. The second leg of the trip, ordered by Uber Account 3,
13 terminated at the Century Motel at 3:52 a.m.

14 82. Another one of the eight border trips, which occurred on January 25, 2022,
15 involved trip-splitting with both legs of the trip being ordered by Uber Account 5.
16 Specifically, the first leg of the trip began near the U.S. – Canada border at 3:18 a.m. and
17 ended at 5:05 a.m. at Sea-Tac Airport. The second leg of the trip originated at the Radisson
18 Sea-Tac at 5:24 a.m. and terminated at 5:35 a.m. at the Century Motel.

19 83. AT&T Wireless records show that the phone number associated to Uber
20 Account 5 is connected to a prepaid account with the subscriber information labeled as
21 “PREPAID CUSTOMER” with an address of 123 Your Street, Your Town, GA. Based on
22 information provided by AT&T, the phone number associated to Uber Account 5—(628)
23 224-5202, *i.e.*, TT5—has been assigned to the same prepaid customer since October 20,
24 2021.

25
26
27 ²¹ According to Uber records, the device model shows “iPhone 8,4.” Based on an open-source
28 search, this nomenclature refers to an iPhone SE.

84. In short, based upon the records reviewed relating to Uber Accounts 1-3 and 5, common origins/destinations among those accounts, and the patterns observed—to include trip-splitting as detailed above, investigators believe that all four accounts have been used predominantly, if not exclusively, by the smuggling organization to transport noncitizens from the area near the U.S. – Canada border, to intermediate locations (including Sea-Tac Airport and the Everett Park and Ride), and then to locations where the noncitizens are staged (the Kent Residence, the Lacey Residence, and Century Motel) before further transportation by the smuggling organization.

D. Review of Surveillance Video of July 24, 2021, Smuggling Event Involving GILL

85. In July 2021, investigators interviewed a target of this investigation. During that interview, the target acknowledged that he/she had recently engaged in activities on behalf of the smuggling organization. Based upon information provided by this individual, identifying a specific smuggling event that occurred on July 24, 2021, HSI SAs David Leon and Laura Marroquin obtained video footage from a Shell gas station, located at 4542 Martin Way E., Olympia, WA.

86. During their review of the surveillance video, investigators noted that at 12:14 a.m., on July 24, 2021, a red sports utility vehicle (SUV) arrived and parked at the station's gas pumps. Approximately three minutes later, the Armada registered to Daljit KAUR at the Elk Grove Residence arrived on the opposite side of the gas pump. Investigators then observed six suspected undocumented noncitizens exit the Armada and enter the red SUV. These individuals were traveling with either no personal belongings or, at most, a backpack.

87. At approximately 12:36 a.m., investigators observed the Armada return to the gas station and park at another gas pump. Within seconds, a grey Chrysler Pacifica minivan, bearing Washington license plate BWS4749, approached the opposite side of the gas pump. A male subject with a long grey beard, with a blue zip-up sweatshirt and grey sweatpants, can be seen exiting the driver's seat of the Armada. Based upon my review of

1 the surveillance video, and my review of multiple photographs of GILL, I believe that the
2 driver of the Armada is GILL. GILL can then be seen speaking with the driver of the
3 minivan, and then appears to direct individuals to exit the Armada and enter the grey
4 minivan. Once again, each of the six individuals is observed to have very little personal
5 belongings. After a few minutes, both vehicles depart the area.

6 88. Based upon registration checks, it was determined that the registered owner
7 of the grey minivan was EAN Holdings, which among other companies, is the parent
8 company of Enterprise Car Rental.

9 89. According to records provided by Enterprise, the renter of the grey minivan,
10 a 2020 Chrysler Pacifica, bearing Washington license plate BWS4749, was Mayankkumar
11 PATEL with a listed address of 825 Eastern Avenue, Fall River, MA 02721. This vehicle
12 was rented on July 23, 2021, in Puyallup, WA, and returned on July 25, 2021, at Chicago
13 O'Hare International Airport. Importantly, Mayankkumar PATEL has been listed on
14 several other one-way rentals related to this investigation, and this organization is known
15 to use rental vehicles to transport undocumented noncitizens from the Seattle area to other
16 locations throughout the United States, including Chicago.

17 90. According to an open-source search in Google Maps, the Lacey Residence is
18 approximately a seven-minute drive from the Shell gas station in Olympia, WA. Based on
19 the timeframe observed in the surveillance footage, I believe that after GILL dropped off
20 the first set of six individuals who left the area in a red SUV, GILL returned to the Lacey
21 Residence, where additional undocumented noncitizens were being staged. I believe that
22 GILL then returned to the same gas station with a second set of noncitizens being
23 smuggled, and these individuals were then further transported in the grey Chrysler minivan
24 that had been rented by Mayankkumar PATEL on July 23, 2021.

25 91. Based upon a review of records provided by Uber, investigators know that
26 there were six split border trips involving Uber Accounts 2 and 3 between July 15, 2021,
27 and July 23, 2021. Each of these trips originated near the U.S. – Canada border in the early
28 morning hours, was split at the Radisson Sea-Tac, and then terminated at the same Lacey,

1 WA, parking lot—that is approximately 2.1 miles from the Lacey Residence. Investigators
2 believe that some, or all, of these six Uber trips involved the initial transport and staging
3 of undocumented noncitizens at the Lacey Residence, before further transport by the
4 smuggling organization on July 24, 2021, as detailed above.

5 **E. Surveillance of August 30, 2021, Smuggling Event Involving GILL**

6 92. On August 30, 2021, at approximately 4:19 a.m., an Uber driver (hereinafter
7 “Uber Driver 1”) provided me with information relating to a fare ordered—with him—by
8 Uber Account 2 that originated near the U.S. – Canada border. Uber Driver 1 advised me
9 that the pickup for this fare occurred at approximately 4:31 a.m. Uber Driver 1 indicated
10 that he was driving a dark colored Toyota Avalon (hereinafter “the Avalon”).

11 93. At approximately 6:30 a.m., agents observed the Avalon enter the parking
12 lot of the Radisson Sea-Tac and drop off four individuals—three adult males and one adult
13 female—all of whom appeared to be of Indian descent. The four individuals each had no
14 more than a backpack in their possession.

15 94. The Avalon departed the parking lot, and the four individuals continued
16 waiting in front of the hotel for approximately ten minutes. At approximately 6:40 a.m., a
17 silver Toyota Camry, bearing Washington license plate BZE2620, approached the hotel.
18 Agents then observed all four individuals enter the silver Camry. Physical surveillance of
19 the silver Camry was initiated as it left the hotel and continued southbound on Interstate 5.

20 95. At approximately 7:18 a.m., agents observed the same four individuals exit
21 the silver Camry in the same Lacey, WA, parking lot discussed throughout this affidavit.

22 96. At approximately 7:24 a.m., the Armada was observed entering the
23 McDonald’s parking lot.

24 97. Upon arriving at the McDonald’s, the driver of the Armada exited the vehicle
25 and agents observed the driver motioning to the four individuals to come towards him. SA
26 Jason Montgomery identified the driver of the Armada as GILL based on a recent
27 photograph that SA Montgomery had observed of GILL. SA Montgomery observed the
28 four individuals walk to the Armada and begin to speak with GILL. The four individuals

1 then entered the Armada, and the vehicle departed with GILL driving. Agents continued
2 physical surveillance of the Armada until it was observed arriving at the Lacey Residence,
3 at approximately 7:30 a.m. Upon arriving, the garage door was opened, the Armada entered
4 the garage, and the garage door was closed immediately before agents observed any
5 passengers exiting the vehicle.

6 98. Based upon a review of Uber records, investigators know that both legs of
7 this trip, *i.e.*, border area to Radisson Sea-Tac and Radisson Sea-Tac to the Lacey, WA
8 parking lot, were ordered by Uber Account 2.

9 **F. Surveillance of September 22, 2021, Smuggling Event Involving GILL**

10 99. On September 22, 2021, investigators received information from another
11 Uber driver (hereinafter “Uber Driver 2”), that at approximately 3:40 a.m., he picked up
12 four individuals from near the U.S. – Canada border. According to records provided by
13 Uber, subsequently reviewed by investigators, this trip was ordered by Uber Account 2.

14 100. Based upon the information provided by Uber Driver 2, agents were able to
15 begin surveillance of this Uber trip on Interstate 5 in Skagit County, WA. Agents continued
16 surveillance of the vehicle, and at approximately 5:59 a.m., observed four individuals exit
17 the vehicle in the parking lot of the Radisson Sea-Tac. SSA James Healy observed that the
18 four individuals appeared to be of Indian descent. The four individuals walked from the
19 Radisson Sea-Tac parking lot to the Red Lion Hotel, directly next door.

20 101. At approximately 6:11 a.m., a second vehicle, bearing Washington license
21 plate BRL6748, entered the Red Lion Hotel and picked up the four individuals. This
22 vehicle traveled southbound on Interstate 5 toward Olympia. At approximately 7:05 a.m.,
23 law enforcement observed the vehicle drop off the four individuals in front of a Safeway,
24 located at 4280 Martin Way E in Lacey, WA, *i.e.*, the same parking lot used by GILL for
25 the pick-up of suspected undocumented noncitizens on August 30, 2021.

26 102. At approximately 7:07 a.m., agents observed the Armada driving around the
27 Safeway parking lot. Agents then observed the Armada approach the individuals and the
28 driver speak with them. All four individuals then entered the vehicle. Based on my

1 observations of the driver and my knowledge of GILL's appearance, I believe the driver of
 2 the Armada to be GILL. The Armada was observed arriving at the Lacey Residence at 7:15
 3 a.m. Upon arriving, the garage door was opened, the Armada entered the garage, and the
 4 door was closed immediately before agents observed any passengers exiting the vehicle.

5 **G. Use of Target Telephones by Subjects of Investigation**

6 **Target Telephone 1 – Suspected Use by GILL in February 2022**

7 103. On February 11, 2022, an HSI Confidential Source (hereinafter "CS-1"),²²
 8 engaged in text communications with a WhatsApp account with TT1 as the account number
 9 (hereinafter the "TT1 WhatsApp Account").²³ According to CS-1, this exchange was with
 10 GILL. CS-1 also indicates that he/she has communicated regularly with GILL via TT1
 11 since at least 2019.

12 104. According to CS-1, during the WhatsApp text exchange, CS-1 and GILL
 13 discussed federal taxes. GILL stated to CS-1 that GILL would pay less taxes if GILL
 14 generated, for other people, IRS Forms 1099—which I know to be used to report contractor
 15 expenses to the IRS. GILL informed CS-1 that if he/she knew someone that needed a loan,
 16
 17

18 ²² CS-1 is cooperating with HSI in the hopes of receiving immigration benefits for members of
 19 CS-1's family. CS-1 is also cooperating with HSI for potential prosecutorial consideration given
 20 his/her concern that he/she would be implicated in the illegal conduct targeted by this investigation.
 21 CS-1 has a personal relationship with GILL that could affect his/her objectivity and could provide
 a basis for CS-1 to not fully disclose all information relating to GILL. CS-1 does not have criminal
 history.

22 CS-1 has not previously been a confidential informant with HSI or any other law enforcement
 23 agency. CS-1 has provided background information on targets of this investigation and documents
 24 corroborating the information. The information provided by CS-1 has been corroborated through
 other means and has been shown to be reliable.

25 ²³ Based upon my training and experience, I know that WhatsApp is an open-source messaging
 26 application available on both Android and iPhone smart phones, and Apple and Windows personal
 27 computers. I know that the account number for a WhatsApp account must be associated with a
 28 cellular telephone number. I also know that to log into a WhatsApp account from another digital
 device, *i.e.*, that is not associated with the telephone number for the WhatsApp account, a user
 must have access to the cellular telephone associated with the account for initial login on a new
 device.

1 GILL could provide a Form 1099 to that individual to show that they had sufficient income
2 for the loan. CS-1 indicated that he/she knew someone that could use such proof of income.

3 105. GILL asked CS-1 to provide a name, address, and tax identification number
4 for the 1099 that GILL would provide. CS-1 provided the requested information to GILL
5 via the TT1 WhatsApp Account. CS-1 also provided GILL an e-mail address to which
6 GILL should send the completed Form 1099.

7 106. On February 17, 2022, at approximately 3:31 p.m., GILL sent CS-1, via the
8 TT1 WhatsApp Account, an image of a 2021 Form 1099-NEC. The payer's information
9 was listed as: ICON FREIGHT LOGISTICS; 2501 TOLBERT DR; TRACY, CA 95377;
10 (510) 816-5642. According to records provided by the U.S. Department of Transportation,
11 I know that the company president of Icon Freight Logistics is Major Singh, the brother of
12 Daljit KAUR. The nonemployee compensation listed on the form was \$84,912.00.²⁴

13 107. At 3:37 p.m., GILL sent a follow-up message, via the TT1 WhatsApp
14 Account, in which GILL indicated that he would send the email requested by CS-1 when
15 GILL got home.

16 108. At 8:13 p.m., CS-1 received an email from iknaamtransport@gmail.com
17 with a subject line of "GS wala 1099." This subject line is consistent with the full name
18 listed in the Form 1099 that GILL had sent via the TT1 WhatsApp Account earlier in the
19 day. The Form 1099-NEC was attached to the email, and the document was titled ICON
20 FREIGHT LOGISTICS. The only text in the body of the email was, "Thank you Iknaam
21 Transport Inc. Elk Grove, CA 95757 Ph. (510) 816-5642."

22 109. According to a March 2021 Small Business Administration Paycheck
23 Protection Program (PPP) loan submitted on behalf of Iknaam Transport Inc., I know that
24

25
26 ²⁴ Based on record checks, it is believed that all names, addresses, and taxpayer identification
27 numbers listed on the 1099-NEC are accurate. However, according to CS-1, in 2021, the listed
28 recipient of the nonemployee compensation, G.S.W., did not provide services of any kind to Icon
Freight Logistics.

1 Daljit KAUR is the owner of this business and is listed as the “CEO” of this company in
2 the PPP loan application.

3 **Target Telephone 3 – November 2021 Bond Package with Daljit KAUR**
4 **Support Letter Listing TT3 as KAUR’s Telephone Number**

5 110. On November 4, 2021, a bond packet was submitted, via email, by an
6 immigration attorney to ICE officers at the Northwest ICE Processing Center (NWIPC) in
7 Tacoma, WA. The bond packet related to V.S., an undocumented noncitizen who was
8 apprehended by the USBP on October 5, 2021. The bond packet included a letter of support
9 for V.S. which was purportedly authored and signed by Daljit KAUR. In the letter, KAUR
10 stated that her telephone number was TT3 and that she has had that phone number for the
11 last eight years.

12 **Target Telephone 4 – Use by GILL in Support of Target Offenses**

13 111. According to records provided by AT&T as recently as February 1, 2022,
14 TT4 was activated on December 1, 2019. According to these records, the listed subscriber
15 for TT4 is “PREPAID CUSTOMER” with a user address “123 Your Street, Your Town,
16 GA 98022.” Consistent with the above subscriber information, billing information
17 associated with TT4 indicates that the payment type is “prepaid.” According to these
18 records, there has been no change in the subscriber of TT4 since it was activated in
19 December 2019.

20 112. On or about December 14, 2021, CS-2 was told by a contact in India that
21 there were three recent arrivals from India in Toronto, Canada. Based upon this phone
22 conversation, and CS-2’s prior involvement in the smuggling organization, CS-2
23 understood that these three individuals were seeking assistance with entry into the United
24 States without authorization. That same day, CS-2 and GILL, using TT4, discussed this
25 matter via recorded phone call.²⁵

26
27 ²⁵ According to CS-2, he/she has spoken to GILL using TT4 for at least two years and knows that
28 the user of TT4 is GILL based upon both phone conversations and face-to-face meetings.

1 113. On December 18, 2021, at approximately 9:04 a.m., GILL, using a
2 WhatsApp account with TT4 as the account number (hereinafter “the TT4 WhatsApp
3 Account”), texted CS-2 the following in the Hindi language, “Hi Brother, send those
4 Toronto people in” and “give them your new name.”

5 114. On December 18, 2021, CS-2 contacted facilitators in India and indicated
6 that the three individuals would be smuggled into the United States through British
7 Columbia. The facilitators in India then booked flight reservations from Toronto to
8 Vancouver on December 21, 2021, for these three individuals.

9 115. On December 19, 2021, at approximately 9:15 a.m., CS-2 texted, to the TT4
10 WhatsApp Account, pictures, names, phone numbers, and flight itinerary of the three
11 individuals that were to be smuggled by GILL.

12 116. On December 21, 2021, Canada Border Services Agency (CBSA) officers in
13 Toronto positively identified all three individuals at the time of check-in at the Toronto
14 International Airport. Upon arrival, CBSA officers in Vancouver also positively identified
15 all three individuals inside the domestic terminal at the Vancouver International Airport.

16 117. During the next month, numerous events occurred which resulted in these
17 three people not being crossed into the United States, including flooding in northern
18 Whatcom County, a week of snow in which areas in northern Whatcom County received a
19 foot or more of snow, and the surveillance of suspected members of the smuggling
20 organization in British Columbia during which members of the organization identified that
21 they were under surveillance by law enforcement.

22 118. On January 25, 2022, GILL, at approximately 5:52 a.m., using the TT4
23 WhatsApp Account, texted CS-2 a photo of one the individual being smuggled by the
24 organization, herein referred to as K.P. The photo of K.P. had an American flag digitally
25 transposed over his shirt.

26 119. On January 25, 2022, GILL, at approximately 10:17 a.m., using the TT4
27 WhatsApp Account, called CS-2 and informed CS-2 that “two, two have come.” GILL
28

1 further stated, “they have to take a flight,” and “they can’t stay in a hotel for so long.” GILL
2 concluded, “with their luck they have arrived. It’s their fate.” This call was recorded.

3 120. Later that afternoon, at approximately 2:53 p.m., using the TT4 WhatsApp
4 Account, GILL sent a screenshot to CS-2 of a January 25, 2022, flight reservation that had
5 been booked from Seattle, WA, to Nashville, TN. The name associated with the reservation
6 was K.P., *i.e.*, the name of the individual who GILL had sent the picture of earlier in the
7 day with an American flag digitally added to the photo. Based upon open-source record
8 checks, on January 25, 2022, Delta Flight 1037 departed from Sea-Tac Airport at 5:52 p.m.,
9 and arrived at Nashville International Airport at 11:40 p.m.

10 121. Moreover, according to the records provided by Uber on March 4, 2022,
11 Uber Account 2, ordered an Uber trip that originated at the Century Motel at 3:43 p.m.,
12 and arrived at Sea-Tac Airport at 3:58 p.m., *i.e.*, approximately one-hour forty-five minutes
13 before the scheduled departure of Delta Flight 1037.

14 122. On January 26, 2022, GILL, using the TT4 WhatsApp Account, texted CS-
15 2 a photo of another individual, J.C., also with an American flag digitally transposed over
16 his shirt. After receiving this photo, CS-2 called GILL, at the TT4 WhatsApp Account.
17 GILL informed CS-2 that, “. . . three have come. Two girls and this boy” (which in context,
18 investigators understand the reference to a “boy” to be a reference to J.C.). This call was
19 recorded.

20 123. At 2:34 p.m., on January 26, 2022, again using the TT4 WhatsApp Account,
21 GILL sent a screenshot to CS-2 of a January 26, 2022, domestic flight reservation from
22 Seattle, WA, to Chicago, IL. The name associated with the reservation was J.C. Records
23 provided by Delta, confirm that J.C. was a passenger on Delta Flight 1116, that departed
24 from Sea-Tac Airport at 10:59 p.m., and arrived at Chicago O’Hare International Airport
25 at 4:19 a.m. the following day.

26 124. Moreover, according to the records provided by Uber on March 4, 2022,
27 Uber Account 2, ordered an Uber trip that originated at the Century Motel at 6:24 p.m.,
28 and arrived at Sea-Tac Airport at 6:38 p.m. Of note, according to the itinerary sent by GILL

1 using the TT4 WhatsApp Account to CS-2, Delta Flight 1116 was scheduled to depart Sea-
2 Tac at 9:00 p.m., on January 26, 2022, but actual departure was not until 10:59 p.m.

3 125. On January 28, 2022, I was notified by USBP Intelligence Agents that they
4 had apprehended two Indian citizens near the U.S. – Canada border, the previous night at
5 approximately 11:19 p.m. One of the two Indian citizens apprehended by USBP was
6 identified as H.C.

7 126. On January 28, 2022, at 2:59 a.m., CS-2 provided me a screenshot of a text
8 message that had been sent to CS-2 from the TT4 WhatsApp Account on January 28, 2022,
9 at 12:42 a.m. The text message sent by the TT4 WhatsApp Account consisted of only the
10 name for H.C. and a thumbs down emoji. Based upon USBP's apprehension of H.C.
11 approximately one hour before the TT4 WhatsApp Account sent this message, I believe
12 this text message was GILL's way of notifying CS-2 that H.C. had been apprehended by
13 USBP.

14 127. On January 29, 2022, GILL, using the TT4 WhatsApp Account, contacted
15 CS-2 and initially requested payment in the amount of \$11,500 per person for the two
16 people (K.P. and J.C.) that the organization had successfully brought into the United States.
17 Upon request by CS-2, GILL reduced his fee to \$11,000 per person, but indicated, "from
18 now on, make it eleven five hundred, because there are a lot of expenses." Later in the call,
19 GILL stated, "I have to get this money to Raj. He is in Canada." This call was recorded.

20 128. On January 30, 2022, GILL, using the TT4 WhatsApp Account, contacted
21 CS-2 and informed him/her that GILL would send instructions on how to send the money
22 owed to GILL. This call was recorded.

23 129. On February 2, 2022, GILL, using the TT4 WhatsApp Account, sent CS-2
24 the following name and address, "Dipak patel, 490 Broadway Street, Brandenburg ky
25 40108." In a follow-up message, using the TT4 WhatsApp Account, GILL asked CS-2 to
26 send the check in the mail to the above address and to send GILL a copy of the check,
27 along with the tracking number.
28

1 130. On February 4, 2022, agents from HSI New York, acting in an undercover
2 capacity, received payment of the \$22,000 smuggling fee from an unknown male of Indian
3 descent. HSI agents then obtained a cashier's check in the amount of \$22,000 and sent the
4 check via FedEx to the name and address that had been provided by GILL. As instructed,
5 CS-2 sent GILL, via the TT4 WhatsApp Account, a picture of the check and the tracking
6 number. GILL, using the TT4 WhatsApp Account, responded back with a praying hands
7 emoji.

8 131. On February 15, 2022, FedEx provided a single IP address relating to
9 customer tracking—on February 5, 2022—of the \$22,000 check that HSI had sent via
10 FedEx to the address provided by GILL. Investigators determined that this IP address was
11 associated with service provided by Alibaba.com. Based upon correspondence with
12 Alibaba.com, investigators were advised that service of legal process for such requests
13 must be made through Alibaba Cloud Computing, Ltd., in the People's Republic of China.

14 132. On or about April 4, 2022, investigators received records from Citibank that
15 show that the \$22,000 check was deposited into a personal checking account at Meade
16 County Bank in Brandenburg, Kentucky.

17 133. According to records Meade County Bank records received on or about April
18 21, 2022, the \$22,000 check was deposited into the personal checking account of Dipak
19 Patel on February 7, 2022.

20 134. While investigators did not locate a single corresponding outgoing transfer
21 matching the \$22,000 smuggling fee, agents did note the Patel made multiple transfers to
22 a Robinhood²⁶ investment account in February and March 2022. Specifically, Patel made
23 transfers to Robinhood of \$5,000 on February 22, 2022, \$5,000 on March 7, 2022, and a
24 second transfer of \$20,000—also on March 7, 2022. Investigators have requested, but not
25

26 ²⁶ Based upon a review of its website available at <https://robinhood.com/us/en/about-us/>, last
27 accessed on May 4, 2022, I know that Robinhood provides various investment and banking
28 products to include stocks, EFTs, cryptocurrency, option trading, margin trading, and ATM card
services.

1 yet received, records relating to these transactions and the associated account(s) from
2 Robinhood.

3 **H. Identification of Capital One Credit Card**

4 135. On March 23, 2022, Capital One Bank (USA), N.A., provided records for
5 the credit card (hereinafter “the Capital One credit card”) that had purchased airfare for
6 K.P.’s flight (Delta #1037) from Seattle to Nashville on January 25, 2022, and J.C.’s flight
7 (Delta #1116) from Seattle to Chicago on January 26, 2022. According to the records
8 provided by Capital One, the account holder for this credit card is “Jaipaul Singh.”²⁷
9 Additionally, the address of record for this account was listed as 10074 Dona Neely Way,
10 Elk Grove, CA, *i.e.*, the Elk Grove Residence, where GILL is suspected to reside.

11 136. Capital One also provided the phone number listed on the account. An
12 administrative subpoena to Verizon revealed that the subscriber of the phone number listed
13 on this account is Daljit KAUR at the Elk Gove residence.

14 137. Finally, Capital One also provided payment information for the credit card
15 account and it was determined that most payments were being paid from a Bank of America
16 checking account for Iknaam Transport, Inc. As previously noted, KAUR is listed as the
17 CEO of this company.

18 **I. Use of Capital One Credit Card to Purchase Airfare for Noncitizens** 19 **Smuggled by the Organization**

20 138. On December 23, 2021, at approximately 3:16 a.m., Uber Account 3 ordered
21 a ride from near the U.S. – Canada border to the Sea-Tac Airport. A subsequent trip-
22 splitting ride, also ordered by Uber Account 3, departed at 5:25 a.m. from the Radisson
23 Sea-Tac, and arrived at the Century Motel at 5:36 a.m. Later that evening, at approximately
24

25
26 ²⁷ Investigators believe this name to be an alias of GILL. A Bank of America (BoA) account
27 previously identified during this investigation also used the name of Jaipaul Singh. This bank
28 account, which was closed in October 2021, had an associated phone number of TT1 and an
address of the Galt Residence. This BoA account was used to pay 10 of the 114 payments during
the requested time period on the Capital One credit card.

1 9:26 p.m., Uber Account 5 was used to order a ride from the Century Motel to the Sea-Tac
2 Airport.

3 139. On December 23, 2021, a United Airlines flight from Seattle, WA, to
4 Newark, NJ, was booked using the Capital One credit card account for two passengers. The
5 credit card statement listed the United Airlines ticket number and the passenger names
6 “PATEL/NIRAV B” and “PATEL/TUSHAR B.”

7 140. A review of the United Airlines passenger manifest for Flight 2345 with
8 service from Seattle, WA to Newark, NJ, showed two passengers listed as
9 “PATEL/TUSHAR B” and “PATEL/TUSHAR B.” The manifest also revealed that the two
10 passengers did not have any checked bags. In my experience, and based upon the
11 investigation to date, individuals that are smuggled unlawfully into the United States do
12 not possess more than a small bag of personal belongings.

13 141. On December 24, 2021, at approximately 2:53 a.m., Uber Account 5 ordered
14 a ride from near the U.S. – Canada border to the Sea-Tac Airport. A subsequent trip-
15 splitting ride, ordered by Uber Account 2, departed from the Radisson Sea-Tac at 5:01
16 a.m., and arrived at the Kent-Des Moines Park & Ride—which is located approximately
17 0.2 miles from the Century Motel—at 5:11 a.m. Later that afternoon, at approximately 3:02
18 p.m., Uber Account 2 ordered a ride from the Century Motel to the Sea-Tac Airport.

19 142. On December 24, 2021, an Alaska Airlines flight from Seattle, WA, to
20 Chicago-O’Hare International Airport, was booked using the Capital One credit card
21 account for two passengers. The credit card statement listed the Alaska Airlines ticket
22 number and passenger names “PATEL/PARAS B” and “PATEL/AKSHAYKUMAR J.”

23 143. A review of the Alaska Airlines passenger manifest for Flight 26 with service
24 from Seattle, WA, to Chicago-O’Hare International Airport showed the passengers listed
25 as “PATEL, PARAS B” and “PATEL, AKSHAYKUMAR J.”

26 144. On February 2, 2022, at approximately 2:53 a.m., Uber Account 5 ordered a
27 ride from near the U.S. – Canada border to the Sea-Tac Airport. A subsequent trip-splitting
28 ride, ordered by Uber Account 3, departed from the Radisson Sea-Tac at 3:43 a.m., and

1 arrived at the Century Motel at 3:52 a.m. Later that evening, at approximately 9:07 p.m.,
2 Uber Account 2 ordered a ride from the Century Motel to the Sea-Tac Airport.

3 145. On February 2, 2022, a United Airlines flight from Seattle, WA to Newark,
4 NJ was booked using the Capital One credit card account for two passengers. The credit
5 card statement listed the United Airlines ticket number and passenger names
6 “DARJI/KOMALBEN K” and “DARJI/KIRANKUMAR J.”

7 146. A review of the United Airlines passenger manifest for Flight 2680 with
8 service from Seattle, WA, to Newark, NJ, showed two passengers listed as
9 “DARJI/KIRANKUMARJ” and “DARJI/KOMALBENK.” The manifest also revealed
10 that the two passengers did not have any checked bags.

11 147. According to CBSA records, Komalben Kiranbhai Darji and Kirankumar
12 Jagdishbhai Darji, entered Canada at Pearson International Airport, Toronto, Canada, on
13 December 24, 2021. A search of U.S. law enforcement databases revealed that Kirankumar
14 Jagdishbhai Darji was refused a visitor visa to the United States in 2015. There is no record
15 of any lawful admission into the United States for either individual.

16 148. On February 8, 2022, at approximately 11:51 p.m., Uber Account 5 ordered
17 a ride from near the U.S. – Canada border to the Sea-Tac Airport. A subsequent trip-
18 splitting ride, ordered by the Uber Account 3 on February 9, 2022, departed from the
19 Radisson Sea-Tac at 2:04 a.m., and arrived at the Century Motel at 2:13 a.m. Later that
20 evening, at approximately 9:28 p.m., Uber Account 2 ordered a ride from the Century
21 Motel to the Sea-Tac Airport.

22 149. On February 9, 2022, an Alaska Airlines flight from Seattle, WA to Chicago-
23 O’Hare was booked using the Capital One credit card account for one passenger. The credit
24 card statement listed the Alaska Airlines ticket number and passenger name
25 “PATEL/DRASTIBEN B.”

26 150. A review of the Alaska Airlines passenger manifest for Flight 718 with
27 service from Seattle, WA, to Chicago-O’Hare International Airport, showed one passenger
28 listed as “PATEL, DRASTIBEN B.”

151. CBSA searched their records and found a match to this subject that entered Canada on a student visa to attend St. Clair College. The subject, Drashtiben Bhikhabhai PATEL, entered Canada through Montréal–Trudeau International Airport on October 29, 2021. CBSA confirmed with the college that the subject never enrolled for classes at this college. A review of various law enforcement databases indicate that this individual has never applied for permission to enter, nor been lawfully admitted into, the United States.

152. During the period requested for the Capital One credit card records (December 10, 2020 – February 21, 2022), the account was used to purchase \$12,400.38 in airfare. Significantly, none of the passenger names for any flights listed on the credit card statements showed the name of the credit card holder.

J. TT3 and TT4 Cell Site Tower Pings Near the Elk Grove Residence During Suspected Smuggling Events

153. On February 8, 2022, at approximately 11:51 p.m., Uber Account 5 ordered a ride from near the U.S. – Canada border to Sea-Tac Airport. This trip was split at Sea-Tac Airport and the second leg of the trip—ordered by Uber Account 3—arrived at the Century Motel at approximately 2:13 a.m.

154. According to cell site search warrant returns provided by AT&T, at 11:05 p.m., on February 8, TT3 pinged off a cell tower approximately 2100 meters from the Elk Grove Residence. According to these same records, the next ping for TT3 occurred on February 9, 2022, at 7:43 a.m. This ping was off the same tower located approximately 2100 meters from the Elk Grove Residence.

155. As noted above, on February 9, 2022, the Capital One credit card purchased Airfare for “PATEL/DRASTIBEN B” from Seattle, WA, to Chicago-O’Hare.

156. On February 10, 2022, at approximately 11:44 p.m., Uber Account 3 ordered a ride from near the U.S. – Canada border to Kent, WA. On February 11, 2022, at approximately 2:03 a.m., Uber Account 2 ordered a ride from the previous drop-off location to the Century Motel. Just prior to the origination leg, at 11:07 p.m. on February

1 10, 2022, TT3 pinged off a cell tower approximately 750 meters from the Elk Grove
2 Residence.

3 157. On February 11, 2022, at approximately 10:40 a.m., Uber Account 2 ordered
4 a ride from near the Century Motel to the Sea-Tac Airport. Just prior to this trip, at 9:04
5 a.m., TT3 pinged off a cell tower approximately 2100 meters from the Elk Grove
6 Residence.

7 158. Of note, TT4 had two pings between 6:00 p.m. on February 10, 2022, and
8 6:00 p.m. on February 11, 2022. Those pings occurred at 6:52 p.m. on February 10, 2022,
9 and at 1:02 a.m. on the morning of February 11, 2022. Both pings were off a cell tower
10 located approximately 2100 meters from the Elk Grove Residence.

11 159. On February 11, 2022, the Capital One credit card purchased Airfare for
12 “CHAUDHAR I/KENIS” from Seattle, WA, to Chicago-O’Hare.

13 160. On February 12, 2022, at approximately 4:06 a.m., Uber Account 3 ordered
14 a ride from near the U.S. – Canada border that arrived at Sea-Tac Airport at approximately
15 6:21 a.m. At 6:39 a.m., Uber Account 5 ordered a trip that originated at the Radisson
16 SeaTac and ended at the Century Motel at 6:50 a.m. According to AT&T records, at 6:18
17 a.m. TT3 pinged off a cell tower approximately 750 meters from the Elk Grove Residence.

18 161. On February 12, 2022, at 1:28 a.m., TT4 pinged off a cell tower
19 approximately 2100 meters from the Elk Grove Residence. The next ping for TT4 was at
20 10:27 a.m. This ping was off a cell tower located approximately 1700 meters from a
21 residence owned by Daljit KAUR that is located at 13461 Marengo Road, Galt, CA,
22 (hereinafter “the Galt Residence”).

23 162. On February 12, 2022, the Capital One credit card purchased Airfare for
24 “BHAVSAR/RAJKUMAR S” from Seattle, WA, to Chicago-O’Hare.

25 163. On March 1, 2022, at approximately 12:08 a.m., Uber Account 5 ordered a
26 trip from near the U.S. – Canada border to Kent, WA. On February 28, 2022, at 11:37 p.m.,
27 TT3 pinged off a cell tower approximately 2100 meters from the Elk Grove Residence.
28

K. March 29, 2022, Smuggling Event and Analysis of PR/TT Data for WhatsApp Accounts Associated with TT1-TT4

164. On March 23, 2022, a court-authorized pen register / trap and trace (PR/TT) was installed on the TT1-TT4 WhatsApp Accounts. As detailed below, a review of the PR/TT data for these accounts showed a significant increase in call and text message activity prior to, during, and after a USBP apprehension of the two Indian nationals on March 29, 2022.

165. On March 29, 2022, at approximately 10:28 p.m., Blaine Sector dispatch notified Border Patrol agents of two individuals crossing unlawfully into the United States from Canada near Lynden, WA. Agents immediately responded to the area, encountered the two individuals, determined they were Indian nationals present in the United States unlawfully, and placed them under arrest at approximately 10:32 p.m.

166. Overall, from March 23, 2022, through March 30, 2022, there were 240 total incoming and outgoing phone calls and 1,224 text messages involving the four WhatsApp accounts. Nearly one-third of the phone calls occurred during a 24-hour period between 10:00 am on March 29, 2022, and 10:00 am on March 30, 2022.

167. In the 24-hour period prior to and after the smuggling event, there were thirty-two phone calls and 110 text messages exchanged between the TT4 WhatsApp Account and a WhatsApp Account associated with (604) 418-8312—a previously unidentified Canadian phone number. Significantly, there was no prior communication between the two WhatsApp accounts between March 23, 2022, and the first observed contact that occurred on March 29, 2022, at 11:56 a.m.

168. Moreover, during this same 24-hour period (beginning on March 29, 2022, at 10:00 a.m.) an additional nine phone calls and twenty-eight text messages were exchanged between the TT4 WhatsApp Account and another WhatsApp Account associated with (778) 848-8634—which also is a Canadian phone number. Again, as with the WhatsApp Account associated with (604) 418-8312, there had been no communication between the TT4 WhatsApp and this account in the week prior.

1 169. Finally, between 1:33 p.m. on March 29, 2022, and 9:33 a.m., on March 30,
 2 2022, there was a significant increase in communication between the TT1 WhatsApp
 3 Account and a WhatsApp account associated with (604) 356-2505—yet another a
 4 Canadian phone number. Specifically, there were a total of eighteen phone calls and forty-
 5 five text messages took place between the TT1 WhatsApp account and the WhatsApp
 6 account associated with (604) 356-2505.²⁸

7 **L. Identification of New Cell Phone (TT6) Used by Jaspal Gill**

8 170. On March 30, 2022, at approximately 3:04 p.m., the user of the TT4
 9 WhatsApp Account texted CS-2, “new nu. 2532982097,” *i.e.*, the call number associated
 10 with TT6.

11 171. On March 31, 2022, at approximately 9:50 a.m., CS-2 placed a WhatsApp
 12 call to the WhatsApp account with (253) 298-2097 as the account number (hereinafter the
 13 “TT6 WhatsApp Account”). The call was recorded and was approximately nine minutes in
 14 duration. During that call, CS-2 confirmed that the user of the TT6 WhatsApp Account
 15 was GILL.

16 172. According to records provided by AT&T on March 31, 2022, TT6 was
 17 activated on March 30, 2022. According to these records, the listed subscriber for TT6 is
 18 “PREPAID CUSTOMER” with a user address “123 YOUR STREET, YOUR TOWN, GA
 19 98409.” The records further indicate that the account was opened on March 30, 2022, *i.e.*,
 20 the day after the U.S. Border Patrol apprehension noted above.

21 **M. The Armada Returns to the Lacey Residence on March 31, 2022**

22 173. On March 31, 2022, at approximately 9:19 p.m., a vehicle similar to the
 23 Armada was observed, via remote video surveillance, arriving at and entering the garage
 24 of the Lacey Residence. Due to the time of day, investigators were unable to see the license
 25

26 ²⁸ It should be noted that while the TT2 and TT3 WhatsApp accounts had activity during the PR/TT
 27 period, no phone calls or text messages were made or received from either of these WhatsApp
 28 accounts on March 29, 2022, or March 30, 2022.

1 plate and therefore could not confirm the vehicle registration. However, an individual
 2 matching GILL's general physical profile, *i.e.*, height and weight, was also observed
 3 exiting the driver's side of the Armada. Upon exiting the vehicle, this individual was then
 4 observed entering the Lacey Residence through a door in the garage.

5 174. On April 1, 2022, at approximately 3:19 p.m.—which was the next time a
 6 vehicle was observed exiting the garage of the Lacey Residence—I was able to positively
 7 identify the vehicle as the Armada that is registered to Daljit KAUR at the Elk Grove
 8 Residence.

9 175. On April 4, 2022, at approximately 9:50 a.m., an individual matching
 10 GILL's general physical profile, *i.e.*, height and weight, was observed leaving the Lacey
 11 Residence. This was the last time, the Armada, or the individual believed to be GILL, has
 12 been observed at the Lacey Residence.

13 176. Based upon recent physical and electronic surveillance, and discussed
 14 further herein, investigators believe that GILL has remained in California during the
 15 months of April and May 2022. Notwithstanding the fact that GILL has remained in
 16 California since early April 2022, investigators believe that on April 16 and April 22,
 17 2022, the Lacey Residence was used by GILL to harbor noncitizens that had just been
 18 smuggled into the United States through the U.S. – Canada border in Whatcom County,
 19 WA.

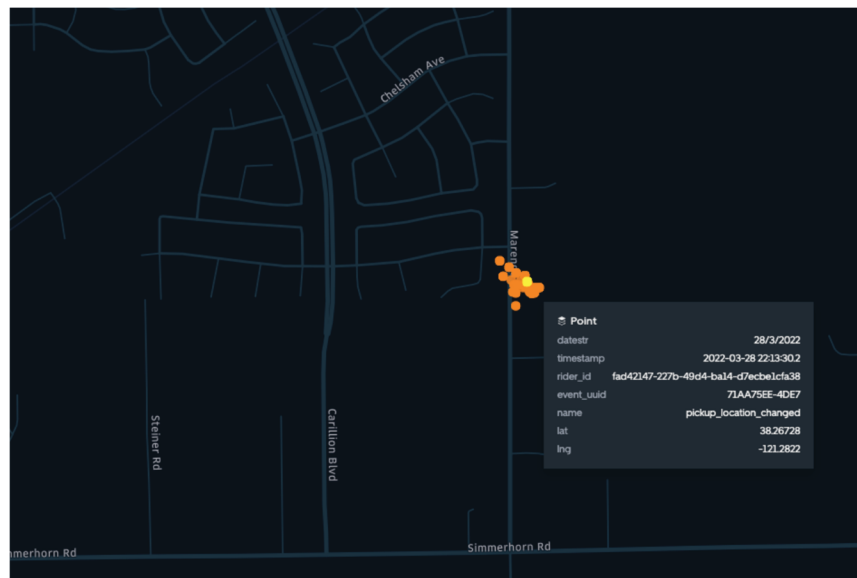
20 **N. March 28, 2022, Suspected Smuggling Activity Conducted from the Galt**
 21 **Residence**

22 177. Based on records provided by Uber, at approximately 3:12 p.m., on March
 23 28, 2022, Uber Account 2 requested a ride from the Century Motel to the Sea-Tac Airport.
 24 Investigators did not locate a complimentary split-border trip from the area near the U.S. –
 25 Canada border to the Century Hotel, but given the patterns observed in this investigation—
 26 to include the near exclusive use of Uber Account 2 for smuggling activities—investigators
 27 believe that this trip involved the transportation of a noncitizen, or noncitizens, to Sea-Tac
 28

1 Airport for further transportation of the undocumented noncitizen(s) in furtherance of their
2 unlawful entry into the United States.

3 178. In the records received from Uber on May 5, 2022, Uber provided GPS
4 coordinates—when that information had been captured by Uber servers—for the location
5 of a device associated with a specific Uber account. This information was provided
6 consistently for Uber Account 1, but no GPS location information was provided for Uber
7 Accounts 2, 3, or 5. Based upon discussions with Uber and my investigation in this case, I
8 know that if a digital device does not have location services enabled, Uber servers will not
9 register GPS information for a digital device. However, that device/account will still be
10 able to order an Uber trip.

11 179. On March 28, 2022, at approximately 3:13 p.m., which corresponds to the
12 ride requested by Uber Account 2 described above, an application event for Uber Account
13 1—shown as “pickup_location_changed”—was registered with the GPS coordinates of
14 38.2671, -121.28209. An open-source search of those GPS coordinates revealed that the
15 location at those coordinates is the Galt Residence. From 3:13 p.m. until 3:27 p.m., Uber
16 was able to collect 242 additional lines of data, all registering slightly different GPS
17 coordinates, but consolidated in one cluster as shown below with the activity clearly
18 occurring at the Galt Residence.



180. A review of cell-site data provided by AT&T and Verizon place several of the devices, attributed to GILL throughout this investigation, near the Galt Residence at the time of this smuggling activity. Specifically, between 3:00 p.m. and 4:00 p.m. on March 28, 2022, TT1, TT3-TT5 pinged off cell-site towers that ranged from 2100 to 3700 meters from the Galt Residence. It should be noted, that there is a cell tower that is approximately 1750 meters from the Galt Residence, but the target phones did not ping off this closer tower during this time frame.

181. Based upon the information by provided by Uber, coupled with the cell-site location information for TT1, TT3-TT5, I believe that GILL was at the Galt Residence when he ordered the suspected smuggling trip from the Century Motel to the Sea-Tac Airport via Uber Account 2.

O. Purchase of Uber Gift Cards in Galt, CA, on March 29, 2022, and Use of Uber Gift Cards During Smuggling Events on April 15 and 16, 2022

182. Based on records provided by Uber, at approximately 6:06 p.m., on March 29, 2022, a purchase of two Uber gift cards totaling \$350 was made at a Rite Aid located at 10570 Twin Cities Road, Galt, CA (hereinafter “the Galt Rite Aid”).²⁹

183. Based on cell-site records provided by AT&T, TT4 is the device that had timestamps/pings that registered around the time of this Uber gift card purchase. At 6:04 p.m., *i.e.*, two minutes before the purchase of the gift card in Galt, CA, TT4 pinged off a cell tower that was located approximately 1750 meters from the Galt Residence. After the purchase of these gift cards, TT4 continued to ping off cell towers (ranging from 1750 meters to 3700 meters) from the Galt Residence. Based on the pings of this device, I believe that GILL returned to the Galt Residence after purchasing these Uber gift cards at the Galt Rite Aid.

184. The first gift card purchased in Galt, CA, on March 29, 2022, was redeemed by Uber Account 3 during a suspected smuggling event detailed below.

²⁹ The Galt Rite Aid is located approximately 2.1 miles from the Galt Residence.

1 185. On April 15, 2022, at 4:33 p.m., Uber Account 3 requested the first leg of a
2 split trip ride, both ordered by Uber Account 3. This first leg originated from Cornwall
3 Avenue in Bellingham, WA, at 4:34 p.m. and ended in Everett, WA, at 6:29 p.m. Based on
4 location data from Uber, the location of the destination in Everett was a Kentucky Fried
5 Chicken restaurant. The second leg of the split-trip, also ordered by Uber Account 3,
6 departed just behind the same restaurant at 6:40 p.m. and arrived at the Century Motel in
7 Kent, WA at 7:25 p.m.

8 186. During the suspected smuggling event detailed above, four of the six phones
9 were active and sending GPS location data.³⁰ From 4:33 p.m. until 7:25 p.m., *i.e.*, the
10 approximate duration of this split trip, TT1, TT2, and TT6 each registered 11 pings, while
11 TT3 registered 12 pings. Approximately 43 out of the 45 pings that occurred during that
12 period registered within the radius (ranging from 719 meters to 2278 meters) of the Elk
13 Grove Residence. The other two pings were within the greater Elk Grove area, but the
14 indicated radius did not include the Elk Grove Residence. However, given the vast majority
15 of these pings included the Elk Grove Residence within the given radius, investigators
16 believe that GILL coordinated this April 15, 2022, suspected smuggling event from the Elk
17 Grove Residence.

18 187. The second gift card that was purchased on March 29, 2022, at the Galt Rite
19 Aid was redeemed on April 16, 2022, at 1:31 a.m. by the user of Uber Account 3. This gift
20 card redemption also corresponds to another suspected human smuggling event that
21 occurred shortly thereafter.

22 188. On April 16, 2022, at approximately 2:48 a.m., Uber Account 3 requested
23 the first leg of a trip-splitting ride that originated from near the U.S. – Canada border. This
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26
27 ³⁰ On April 6, 2022, investigators obtained GPS ping warrants for TT1-TT6. MJ22-134(1)-(2)
28 (W.D. Wash. April 6, 2022). Investigators began receiving GPS location from Verizon and AT&T
on April 8, 2022.

trip originated at 3:16 a.m., near 2855 Whitewood Drive in Custer³¹ and arrived at Sea-Tac Airport at 5:15 a.m. The second leg of the split-trip, ordered by Uber Account 1, departed the Radisson Sea-Tac at 5:31 a.m. and at 6:21 a.m. arrived at 2727 Fiddleback Street NE, Lacey, WA. This location is three houses away from the Lacey Residence.

189. Based on remote video surveillance at the Lacey Residence, at 6:20 a.m., the garage to the residence opened without any cars in the area. Less than a minute later, three individuals, each appearing to be carrying a backpack, walked up to the residence, entered the garage, and walked into the house. After a short time, the garage then closed behind them.



190. Later that evening, at approximately 8:37 p.m., a ride was ordered by Uber Account 1 from 2801 Fiddleback St. NE in Lacey, WA, which is directly next door to the Lacey Residence. This Uber trip arrived at Sea-Tac Airport at 9:25 p.m.

191. Based on the remote video surveillance from the Lacey Residence, at 8:37 p.m., what appears to be the same three individuals that arrived earlier in the morning,

³¹ As discussed later in this affidavit, this was the exact location of a ride ordered by Uber Account 3, in which three undocumented noncitizens were apprehended by U.S. Border Patrol agents on April 21, 2022,

1 emerged from the garage and stood outside until, within thirty seconds, a vehicle pulled up
2 and the individuals entered the vehicle. Based on the time and vehicle described by Uber,
3 I believe this to be the same trip, ordered by Uber Account 1, to the Sea-Tac Airport.
4 Through my investigation, I believe these people to be undocumented noncitizens that
5 GILL had smuggled into the United State and harbored at the Lacey Residence, before
6 their additional transportation in furtherance of their unlawful entry into the United States.



192. During the suspected smuggling event that occurred on April 16, 2022, four
of the six phones were active and sending location data. From 1:31 a.m. until 6:25 a.m.,
i.e., the duration of the split border trip, TT1, TT2, TT3 and TT6 each registered
approximately 18-20 pings. All 79 pings that occurred during that period registered within
the radius (ranging from 719 meters to 2278 meters) of the Elk Grove Residence. Due to
the consistency of these pings, which included the Elk Grove Residence within the given

1 radius, investigators believe that GILL coordinated this April 16, 2022, smuggling event
2 from the Elk Grove Residence.

3 **P. U.S. Border Patrol Apprehensions in Late April 2022, Analysis of GPS,**
4 **PRTT Data, Uber Data, and Video Surveillance of GILL**

5 193. On or about Tuesday, April 19, 2022, CS-2, was contacted by GILL via the
6 TT6 WhatsApp Account. During this call, which was recorded, GILL asked CS-2 if “our
7 guy in Vancouver was available tomorrow.” According to CS-2, GILL informed CS-2 that
8 GILL would need the person to drop people off two times in the same spot. GILL further
9 clarified that it would be three people each time. GILL told CS-2 that this was for
10 Wednesday [April 20, 2022]; however, Thursday was not confirmed due to possible bad
11 weather.³²

12 194. According to GPS location data provided by AT&T, the two pings that
13 occurred before and after the April 19, 2022, call via the TT6 WhatsApp Account indicate
14 that TT6 was in Galt, CA, at the time of time of the call. Specifically, the GPS ping prior
15 to the call placed TT6 within an 1881-meter radius that included the Galt Residence, and
16 the second ping placed TT6 within a 653-meter radius—which also included the Galt
17 Residence. According to GPS location provided by Verizon, TT1 was located within a
18 1164-meter radius prior to the call and a 1709-meter radius after the call—with the Galt
19 Residence being included within both of the respective radiuses.

20 195. During this timeframe, TT2 and TT3 were pinging within a specific radius
21 that included the Elk Grove Residence. As such, I do not believe that GILL was in
22 possession of TT2 or TT3 at the time of the above WhatsApp call.

23 196. Investigators were not receiving GPS location data for TT4 or TT5 during
24 the time of this call.

25
26
27 ³² Due to the recency of the call, HSI has been unable to get this call professionally transcribed
28 prior to the writing of this affidavit. The details of this call are based solely on the information
provided to me by CS-2.

April 20-21, 2022, Smuggling Event

197. On April 20, 2022, Blaine Station Border Patrol Agents (BPAs) were performing line watch duties along the U.S. - Canada border. At approximately 9:13 p.m., Supervisory Border Patrol Agent (SBPA) Jonathan Oman and Executive Officer Artemio Mendoza (hereinafter referred to as sUAS³³ operators) began conducting sUAS operations scanning the border area for individuals unlawfully entering the United States from Canada.

198. At 10:00 p.m., sUAS operators notified agents in the surrounding area that they had identified three individuals approximately 200 yards south of the U.S. – Canada border. The sUAS operators maintained visual of the three individuals until approximately 1:54 a.m., on April 21, 2022, when they terminated the flight due to battery issues. BPAs assigned to Blaine Station maintained positions in the surrounding area to prevent the individuals from leaving the area undetected.

199. At approximately 3:15 a.m., BPA Joseph Escalante, who was operating a mobile surveillance capability (MSC) vehicle in the vicinity of Custer School Road and Haynie Road in Custer, WA, observed what appeared to be three individuals hiding in a ditch. This area is approximately 2.5 miles south of the U.S. – Canada border.

200. At approximately 3:20 a.m., Border Patrol Agents responded to the area. SBPAs Naminder Bhumber and Keith Varga also responded to assist in the search. Upon arrival, agents discovered three males hiding in a ditch, at or near where they had been last seen by the MSC operator.

201. All three individuals, later identified as G.S., R.D., and K.C., were unable to communicate in the English language. However, SBPA Bhumber was able to communicate with the three individuals in the Hindi language. SBPA Bhumber, speaking in the Hindi language, determined that all three individuals were citizens and nationals of India. Each

³³ uSAS are small, unmanned aircraft systems and commonly referred to as drones.

1 acknowledged that they had unlawfully entered the United States by walking across the
2 border from Canada.

3 202. After the apprehension of these three individuals, SBPA Varga encountered
4 a white sedan in the area. During a brief interaction with the driver, SBPA Varga learned
5 that the driver was an Uber driver looking for his fare. SBPA Varga learned that the
6 intended destination of the fare was Sea-Tac Airport. The Uber driver also informed SBPA
7 Varga that he had spoken to a male individual with a heavy Indian accent, but who spoke
8 near perfect English, that had called the Uber driver prior to the time that the driver had
9 arrived at the pick-up location.

10 203. A review of the PR/TT data for TT3 revealed an outgoing call at 2:50 a.m.
11 to the phone number (360) 788-5114. Research into this number showed that it is a phone
12 number registered to Uber that appears to be a switchboard number that connects the caller
13 directly to the Uber driver of a respective fare.

14 204. A review of GPS data for TT3 revealed that the pings that occurred on April
15 21, 2022, at 2:45 a.m. and 3:00 a.m., *i.e.*, immediately before and after this call, indicate
16 that TT3 was in the same location. According to information provided by AT&T, TT3 was
17 located within a 2278-meter radius that included the location of the Elk Grove Residence.

18 **Purchase of Uber Gift Cards at Elk Grove, CA, Walgreens on April 21, 2022**

19 205. According to Uber records, on April 21, 2022, at 12:54 a.m., Uber gift cards
20 in the amount of \$150 and \$200 were purchased at a Walgreens in Elk Grove, CA.
21 According to these same records, these gift cards were credited to Uber Account 3 at 2:15
22 a.m. and 2:17 a.m. later that morning. Uber records further confirmed that at 2:59 a.m.,
23 Uber Account 3 ordered a fare with an origination near where the three noncitizens were
24 apprehended—as detailed above—with an intended destination of Sea-Tac Airport.

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206. On May 6, 2022, investigators obtained video surveillance from a Walgreens located at 7299 Laguna Blvd, Elk Grove, CA (hereinafter “the Elk Grove Walgreens”),³⁴ where the Uber gift cards that were redeemed to Uber Account 3 were purchased. According to that surveillance video,³⁵ an individual that investigators believe to be GILL based upon observed physical characteristics—to include height, weight, approximate age, and a distinctive beard that is several inches in length, mixed black and grey around the mouth, but almost completely grey where it terminates below the neckline, was observed purchasing the Uber gift cards. Based upon review of the video surveillance, the individual suspected to be GILL paid cash for the gift cards.



April 20-21, 2022, Analysis of PR/TT Data for WhatsApp Accounts Associated with TT1-TT4

207. In the 24-hour period prior to, during, and after the April 20-21, 2022, smuggling event detailed above, there were seventeen phone calls and 44 text messages exchanged between the TT1 WhatsApp Account and a WhatsApp Account associated with (604) 356-2505, *i.e.*, a number previously observed during the March 29, 2022, suspected

³⁴ Based upon a review of an open-source mapping application, I know that this Walgreens is approximately 3.7 miles from the Elk Grove Residence.

³⁵ For reasons that are unknown to investigators, the timestamp on the Walgreens’ surveillance video appears to be off (later) by one hour.

1 smuggling event discussed above.

2 208. Moreover, during this same 24-hour period (beginning on April 20, 2022, at
3 10:00 a.m.) an additional five phone calls and nineteen text messages were exchanged
4 between either the TT2 or TT4 WhatsApp Accounts and another WhatsApp Account
5 associated with (360) 201-6343. Importantly, there had been no communication between
6 the TT1-TT4 WhatsApp accounts and this account in the three days prior.

7 209. Finally, during this 24-hour period, nearly a quarter of the calls and text
8 messages (29 and 102 respectively) involving the TT1-TT4 WhatsApp Accounts were with
9 a WhatsApp account that had a telephone number with the India country code, *i.e.*, +91-
10 6354972038. Significantly, there was no communication with this WhatsApp account in
11 the week prior to this smuggling event.

12 210. Investigators believe that the observed increase in communications on the
13 day of the verified smuggling events relates to planning and coordination between GILL
14 and co-conspirators involved in the smuggling of the individuals into the United States.

15 **April 20, 2022, Smuggling Event GPS Locations**

16 211. During the smuggling event that occurred on April 20 and 21, 2022, four of
17 the six phones were active and sending location data. TT1, TT2, TT3, and TT6 each
18 registered 28 pings from 9:00 p.m. on April 20, 2022, and 4:00 a.m., on April 21, 2022. As
19 detailed in the exhibit below, approximately 108 out of the 112 pings that occurred during
20 that period registered within the radius (ranging from 719 meters to 2500 meters) of the
21 Elk Grove Residence. The other four pings were within the greater Elk Grove area, but the
22 indicated radius did not include the Elk Grove Residence. However, given the
23 overwhelming majority of these pings included the Elk Grove Residence within the given
24 radius, coupled with the purchase of Uber gift cards at a Walgreens located near the Elk
25 Grove Residence, investigators believe that the GILL coordinated the April 20-21, 2022,
26 smuggling event from the Elk Grove Residence.



April 20-21, 2022, Smuggling Event Phone Seizures

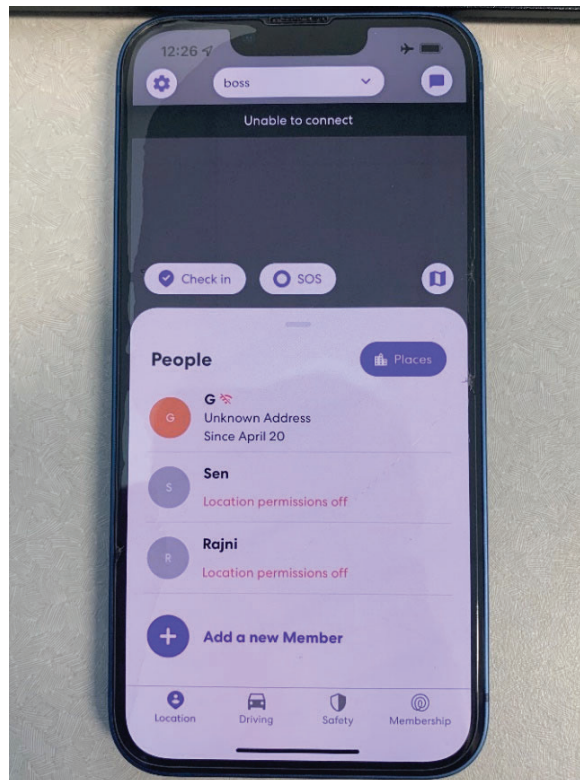
212. After the arrests on April 21, 2022, I seized three cellular phones found by Border Patrol agents in the possession of the undocumented noncitizens during a search incident to arrest of the individuals. On May 4, 2022, U.S. Magistrate Judge Mary Alice Theiler issued a federal search warrant for those devices. On May 6, 2022, HSI Special Agent Matthew Kimmel conducted an extraction of the devices and produced a report that showed the contents of the devices.

213. A review of the extraction report for TT3 shows that this device was in contact with an iPhone 13 (seized from G.S.), and Redmi cellular phone (seized from R.D.) at the time of G.S. and R.D.'s apprehension.

214. A review of PR/TT data confirms the information found through the digital extraction of the devices. Specifically, the phone numbers associated with the iPhone 13 seized from G.S. are (253) 448-4902 (SIM) and (236) 558-3516 (WhatsApp). And the Redmi device had a WhatsApp account that had a telephone number with the India country code, *i.e.*, +91-7859829241. According to the PR/TT data, there were 15 voice calls and 18 text messages between TT3 and the iPhone 13 between 6:47 p.m. and 8:25 p.m. There were additional 11 voice calls and 26 messages between TT3 and the Redmi device between the hours of 6:49 p.m. and 12:59 a.m. (April 21, 2022). During the timeframe of

these phone calls, TT3 registered 28 pings, including 22 of which registered within the radius (2278 meters) of the Elk Grove Residence.

215. Also found on the iPhone 13, was the Life360 application, which investigators believe GILL uses to track the location of the undocumented noncitizens as they unlawfully enter the U.S., and ultimately to direct them to the location of the Uber pick-up. A review of both the extraction report for G.S.'s iPhone 13, and the physical device, shows a location for the user "G"³⁶ near the U.S. – Canada border. Two other names, "Sen" and "Rajni," are shown as individuals in the Life360 family circle. However, the locations of these individuals are unavailable. Due to their location not being available, and through prior investigation in this case, I believe that the "Sen" and "Rajni" Life 360 profiles belong to those engaged in the smuggling of this group of individuals into the United States.



³⁶ I believe that the individual in the Life360 circle identified as "G" is G.S., who was apprehended by USBP on April 21, 2022.

216. In a recorded phone call between GILL and CS-2 on January 13, 2022, GILL refers to the app called “360.” In this conversation, GILL discusses with CS-2 the need to delete the app, so “they³⁷ cannot see where these people came from.” GILL further states, “They know where these people are f**king coming. One hundred percent.” GILL goes on to say, “...they were caught by the Border Patrol. After that, when I was deleting the 360 app, I saw that they were going on a street and the speed limit was 45 miles per hour.”

April 22, 2022, Smuggling Event, Purchase of Uber Gift Cards at Walgreens in Elk Grove, CA, and Video Surveillance from the Lacey Residence

217. According to records obtained from Uber, gift cards in the amounts of \$100, \$200, and \$200 were purchased at the Elk Grove Walgreens on April 22, 2022, at 2:14 a.m. According to Uber records, two of these gift cards were credited to Uber Account 2 at 3:26 a.m. and 3:27 a.m. later that morning. The third \$200 gift card was credited to Uber Account 1 at 6:22 a.m. on April 22, 2022.

218. On April 22, 2022, an individual that investigators believe to be GILL was observed on surveillance video at the Elk Grove Walgreens purchasing Uber gift cards. Based on the surveillance video, the individual suspected to be GILL paid cash for the gift cards.



³⁷ Based on my reading of the transcript of the recorded phone call, I believe that GILL is referring to Border Patrol agents when he uses the term “they.”



219. Investigators believe that the above-noted Uber gift card purchases relate to a split border trip involving Uber Accounts 1 and 2 on the morning of April 22, 2022. Specifically, at 5:18 a.m., a ride ordered by Uber Account 2 was picked up from Delta Line Road in Blaine, WA. This ride terminated at approximately 6:55 a.m. at 12952 4th Avenue W., Everett, WA, which is in close proximity to the Mariner Park & Ride and is a location where Uber trips have previously been split. At 7:06 a.m., a ride ordered by Uber Account 1 was picked up close to the location where the border leg ordered by Uber Account 2 had terminated. The second leg of the trip concluded at 8:21 a.m., approximately .2 miles from the Lacey Residence.

220. At approximately 8:29 a.m., on April 22, 2022, based upon review of remote video surveillance, investigators know that the garage of the Lacey Residence opened. No vehicle was in sight at that time. A few seconds after the garage door opened, and as detailed in the below photo, unidentified individuals—each wearing a backpack—walked into the garage of the Lacey Residence. The individual that was in front of the group appeared to be talking on a cell phone as the group of four entered the garage of the Lacey Residence. At 8:31 a.m., the garage was closed with the four individuals still inside the garage.

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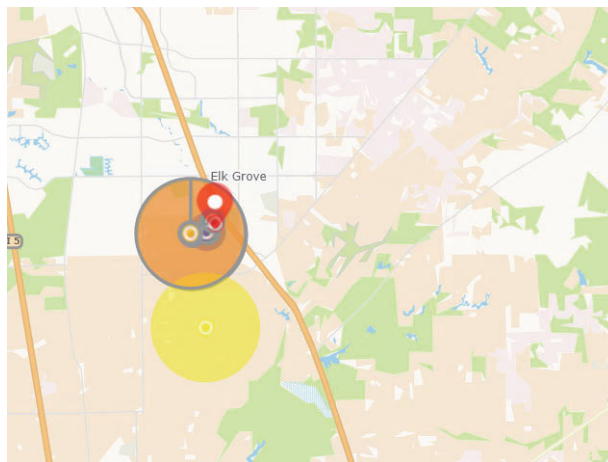
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April 22, 2022, Smuggling Event GPS Locations

221. During the suspected smuggling event detailed above, four of the six phones were active and sending location data. TT5 was not sending any location data during this timeframe, and TT4 was not sending data until investigators believe that it was turned on at approximately 6:31 a.m. Once TT4 began providing location information, the pings placed TT4 within a 2278-meter radius that included the Elk Grove Residence.

222. On April 22, 2022, between 2:00 a.m. and 9:00 a.m., TT1, TT2, TT3, and TT6 each registered approximately 26-28 pings. As detailed in the exhibit below, approximately 117 out of the 119 pings registered within the radius (ranging from 402 meters to 2278 meters) of the Elk Grove Residence. Given all but two these pings included the Elk Grove Residence within the given radius, coupled with the purchase of Uber gift cards at a Walgreens located near the Elk Grove Residence, investigators believe that GILL coordinated the April 22, 2022, smuggling event from the Elk Grove Residence.



Purchase of Uber Gift Cards at Walgreens in Elk Grove, CA on April 24, 2022

223. According to records obtained from Uber, gift cards in the amounts of \$100 and \$200 were purchased at the Elk Grove Walgreens on April 24, 2022, at 12:32 a.m. According to Uber records, these gift cards were credited to Uber Account 2 at 1:56 a.m. and 1:57 a.m. later that morning.

224. Though these two gift cards were credited to Uber Account 2, investigators did not locate a corresponding Uber trip ordered by Uber Account 2 on the morning of April 24, 2022. Rather, investigators located a trip that was ordered by Uber Account 3 that originated in Lynden, WA, at 2:43 a.m., and terminated in Kent, WA, at 5:08 a.m. The second trip-splitting leg of this suspected smuggling event is currently unknown.

225. On April 24, 2022, an individual that investigators believe to be GILL was observed on surveillance footage at the Elk Grove Walgreens purchasing Uber gift cards. Based on the surveillance video, the individual suspected to be GILL paid cash for the gift cards.



Communication between CS-2 and GILL on April 24, 2022

226. On April 24, 2022, at approximately 3:04 a.m., GILL sent two messages via the TT6 WhatsApp Account to CS-2 stating, "...please call in morning. Need cards to setup unbr [sic] account urgently (praying hands emoji)." According to GPS pings for TT6 at

2:55 a.m. and 3:10 a.m., *i.e.*, the pings prior to and following this message, TT6 was located within a 2278-meter radius that included the Elk Grove Residence.

227. Later that morning, at approximately 10:30 a.m., GILL placed a call to CS-2 via the TT6 WhatsApp Account. During this recorded conversation, GILL indicated that a few Uber accounts of his had been suspended.³⁸ GILL asked CS-2 to send him a credit card number to create an additional Uber account(s).³⁹ GILL offered to provide \$1,000 USD in exchange for a credit card number and zip code. GILL indicated that no money would be charged to the account, but he needed the credit card number to get the account started. GILL indicated that once the account was created, he would load his gift cards to the account to pay for the trips. A GPS ping at 10:28 a.m., placed TT6 within a 538-meter radius that included the Galt Residence.

Creation of New Uber Account

228. Based on records received from Uber on May 5, 2022, investigators learned that a new Uber Account—linked to Uber Account 1 by device—was created at approximately 2:48 a.m. on April 25, 2022. The account name was “dilw rai.” Uber records also show that the GPS data associated with this rider account on the day of sign-up placed the user of the account at the Elk Grove Residence. This account has had one trip request that occurred on April 27, 2022; however, the trip was canceled by the rider and was not completed. According to Uber records, the trip was requested for the Seattle area, but GPS data placed the user of the Uber application at the Elk Grove Residence.

³⁸ On Friday, April 22, 2022, Uber advised me that they would be banning from their platform several of the Uber accounts involved in apparent smuggling activities. Due to the apparent use of their services in furtherance of human trafficking activities, Uber agreed to notify law enforcement of rides ordered by previously identified suspect accounts, as well as any new accounts believed to be created by GILL.

³⁹ According to the Uber website (<https://help.uber.com/riders/article/how-do-i-create-an-uber-account--?nodeId=fdcf0273-f67e-4545-9885-f89d0ca0aacf>), in addition to an email address and phone number, a credit or debit card is necessary to create a rider account.

April 26, 2022, Smuggling Event

229. On April 26, 2022, at approximately 4:45 a.m., Uber notified me that a ride had been ordered for pick-up at 9436 Delta Line Road in Blaine, WA.⁴⁰ I immediately notified Blaine Sector Dispatch that I suspected that there may be undocumented noncitizens in the area of that address.⁴¹ Based upon my notification, Border Patrol agents assigned to the Blaine Border Patrol Station responded to the area.

230. Upon arriving at the reported location at approximately 5:08 a.m., SBPA Edward Payment and BPAs Dustin Mattson, David Serrato, Jared Ferree and Joseph Escalante observed four individuals appearing to conceal themselves in the brush near the road. Agents approached the four individuals and identified themselves as United States Border Patrol Agents. SBPA Payment questioned each of the individuals as to their citizenship. All four, later identified as S.P., J.P., R.P., and L.P., stated that they spoke limited English but understood the questioning. All stated that they were citizens and nationals of India and admitted to illegally entering the United States by walking across the border from Canada.

231. At the Bellingham Border Patrol station in Ferndale, WA, the four individuals were fingerprinted, and photographs were taken and enrolled into Department of Homeland Security databases. Records checks revealed that L.P. had been ordered removed from the United States on July 24, 2019, and was returned to India on September 27, 2019. A search of the other individuals revealed no immigration history.

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⁴⁰ Uber responded to an administrative subpoena on May 5, 2022, which indicated that the Uber account used on this occasion was under the name “jadip kumar”. This account had recently been identified, but, to my knowledge, had only been used on one prior occasion during the second leg of a split trip with Uber Account 3 on October 27, 2021.

⁴¹ This area is less than two miles east of the location that the three undocumented noncitizens were encountered on April 21, 2022, and less than two miles south of the U.S.- Canada border.

232. On April 26, 2022, L.P.⁴² was interviewed by BPA-I Michael J. Owens and BPA-I Pasquale at the Bellingham Border Patrol Station. Agents advised L.P. the interview was being audio recorded. During the interview, L.P. admitted to being a citizen and national of India. L.P. stated that she illegally crossed into the United States from Canada on April 26, 2022. L.P. stated that she followed a man she was arrested with today because he had a cellphone and was receiving directions. L.P. stated that S.P. (who she referred to by S.P.'s first name) was on the phone and providing directions for where the group should go.

233. On April 26, 2022, R.P. was interviewed by BPA-I Owens and BPA-I Pasquale at the Bellingham Border Patrol Station. Agents advised R.P. that the interview was being audio recorded. R.P. admitted to being a citizen and national of India. R.P. stated he illegally crossed into the United States from Canada on April 26, 2022. R. P. did not offer information on his smuggling arrangements or the details of his illegal entry into the United States.

234. On April 26, 2022, J.P. was interviewed by BPA-I Owens and BPA-I Pasquale. Agents advised J.P. the interview was being audio recorded. J.P. admitted to being a citizen and national of India. J.P. stated she illegally crossed into the United States from Canada on April 26, 2022. J.P. stated she recently traveled to Canada and entered Canada as a student. J.P. did not offer more information regarding her smuggling arrangements or illegal entry into the United States.

235. On April 26, 2022, S.P. was interviewed by BPA-I Owens and BPA-I Pasquale at the Bellingham Border Patrol Station. Agents advised S.P. that the interview was being audio recorded. S.P. admitted to being a citizen and national of India. S.P. stated he illegally crossed into the United States from Canada on April 26, 2022.

⁴² During the interview with L.P., and the others that were apprehended on April 26, 2022, agents utilized a Gujarati interpreter from Interpreters and Translators, Inc.

236. Agents questioned S.P. as to why all the individuals in his group were following him into the United States. S.P. stated he took a phone from the other man in his group because this individual had trouble seeing. S.P. stated the phone was given to the group by an unknown person. S.P. stated he was receiving information on where to go via phone from an unknown man speaking Hindi. S.P. stated the unknown man did not discuss Border Patrol operations nor did this unknown person provide information about whether there would be transportation waiting for the group once they entered the United States.

237. S.P. stated the unknown man was giving directions to the group via a Compass application found on the phone.⁴³ As an example, S.P. explained the unknown man would say, “walk north 160 degrees” or “walk south 120 degrees.” S.P. stated that he was going to pay a fee of an unknown amount to an unknown individual after S.P. successfully entered to the United States.

April 26, 2022, Analysis of PR/TT Data for WhatsApp Accounts Associated with TT1-TT4

238. In a 5-hour period (8:00 p.m. until 1:00 a.m.) prior to and during smuggling event, there were nine phone calls and 33 text messages exchanged between the TT3 WhatsApp Account and a WhatsApp Account associated with (587) 207-4323—a previously unidentified Canadian phone number. Significantly, there was no prior communication between the two WhatsApp accounts between March 24, 2022, and the first observed contact that occurred on April 25, 2022, at 8:07 p.m.

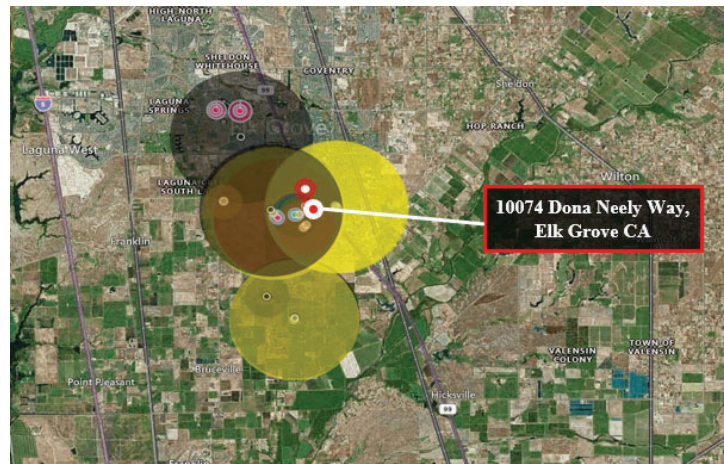
239. Moreover, during a 12-hour period (6:00 p.m. on April 25, 2022, until 6:00 a.m. on April 26, 2022), an additional eighteen phone calls and sixty-one text messages were exchanged between either the TT2 or TT3 WhatsApp Account and another WhatsApp Account associated with (360) 201-6343, that investigators also suspect was involved in the April 20-21, 2022, smuggling event discussed above.

⁴³ Investigators believe that the unknown man referenced by S.P. was GILL and that he was guiding this group using the Life360 app.

240. Finally, during the same 12-hour period, nearly thirty percent of the calls and text messages (49 and 199 respectively) involving the TT1-TT4 WhatsApp Accounts were between TT3 and a WhatsApp account that had a telephone number with the India country code, *i.e.*, +91-9510084667. Significantly, there has been no record of any communication with this phone number at any point during this investigation.

April 26, 2022, Smuggling Event and GPS Locations for TT1-TT6

241. During the smuggling event that occurred into the early morning hours of April 26, 2022, all six of the phones were active and sending location data. Each of the devices registered either 27 or 28 pings from 9:00 p.m., April 25, 2022, until 4:00 a.m., April 26, 2022. As detailed in the exhibit below, approximately 155 out of the 165 pings registered within the radius (ranging from 653 meters to 2507 meters) of the Elk Grove Residence. The other ten pings were located within the greater Elk Grove area, but the provided radius did not include the Elk Grove Residence. However, given that the vast majority of the location pings included the Elk Grove Residence within the specified radius, investigators believe that the GILL coordinated the April 26, 2022, smuggling event from the Elk Grove Residence.



CBSA Records

242. According to CBSA records, S.P. arrived at the Toronto International Airport on April 15, 2022, on a study permit to attend Coast Mountain College in British Columbia, Canada.

243. According to CBSA records, J.P. arrived at the Toronto International Airport on April 15, 2022, on a study permit to attend Loyalist College in Ontario, Canada.

244. According to CBSA records, R.P. arrived at the Toronto International Airport on April 21, 2022, on a study permit to attend Northern College of Applied Arts and Technology in Ontario, Canada.

245. According to CBSA records, L.P. arrived at the Toronto International Airport on October 26, 2021, on a single-entry visa. L.P. was sponsored by a Canadian citizen spouse via an overseas application.

Communication between CS-2 and GILL on April 26, 2022

246. At approximately 7:27 a.m., on April 26, 2022, *i.e.*, in the hours after the arrest of S.P., J.P., R.P., and L.P. by U.S. Border Patrol, GILL made an outgoing phone call to CS-2 via the TT6 WhatsApp Account. This phone call was recorded. GILL informed CS-2 that the police⁴⁴ understand his Uber scheme and that his four people were arrested. GILL stated that—similar to last week—he requested an Uber, it was subsequently cancelled, and then the people were arrested by Border Patrol agents.⁴⁵ GILL informed CS-2 that three people got through earlier in the morning since he used a different route. GILL further stated that he will have to do things differently and offered \$1,500 per person to anyone willing to pick up the people after they successfully cross the border into the United States. GILL also told CS-2 that he has ten more people in Canada.

247. GPS data for TT6 at 7:21 a.m., *i.e.*, immediately prior to the call, placed TT6 within a 2278-meter radius that included the Elk Grove Residence. However, the next three pings that occurred at 7:36 a.m., 7:51 a.m., and 8:06 a.m., all occurred in the same location, and the radius provided by AT&T did not include the Elk Grove Residence. However, at

⁴⁴ This was later clarified in the phone call that by police, GILL meant Border Patrol.

⁴⁵ Investigators believe that GILL is referring to the April 21, 2022, apprehension of three Indian nationals discussed earlier in this affidavit.

1 8:21 a.m., location information placed TT6 within a 2278-meter radius, that included the
2 Elk Grove Residence.

3 **April 27, 2022, Smuggling Event**

4 248. On April 27, 2022, Blaine Station Border Patrol Agents (BPA) were
5 performing line watch duties along the U.S. – Canada border in Blaine Border Patrol
6 Station's area of responsibility. At approximately 11.00 p.m., Blaine Sector Dispatch
7 notified agents of three male individuals walking along a fence line approximately 0.6
8 miles south of the United States – Canada border. This location is approximately two miles
9 west of the Lynden, Washington Port of Entry.

10 249. Blaine Sector Dispatch immediately located the individuals via a Remote
11 Video Surveillance System (RVSS) camera in the above-mentioned area and notified
12 responding Border Patrol Agents Joseph Escalante, David Serrato, and Dustin Mattson.
13 Upon arrival of responding Agents, Blaine Sector Dispatch directed agents to the location
14 of the individuals who were attempting to conceal themselves in a nearby tree line.

15 250. The above-mentioned agents approached these individuals and identified
16 themselves as United States Border Patrol Agents. BPA Escalante questioned each of the
17 individuals as to their citizenship. All three, later identified as R.S., M.P., and D.P., stated
18 that they spoke English and understood the questioning. Each subject stated that they were
19 citizens and nationals of India and admitted to illegally entering the United States by
20 walking across the border from Canada.

21 251. They were then transported to Bellingham Border Patrol Station where all
22 individuals were fingerprinted, and photographs were taken and enrolled into Department
23 of Homeland Security databases. Records checks revealed no previous immigration
24 history.

25 252. On April 28, 2022, R.S. was interviewed by BPA-I Parminder Singh and
26 BPA-I Leonardo Marroquin. Agents advised R.S. that the interview was being audio
27 recorded. R.S. stated he was born and raised in Ahmedabad, Gujarat, India. R.S. stated that
28 he departed India on April 23, 2022. R.S. stated that he entered Canada in Toronto, Ontario,

1 where he stayed at a hotel for one night (6 Cost Hotel). R.S. then traveled from Toronto to
2 Vancouver via flight. He then stayed at a Ramada Hotel in Vancouver for two nights.

3 253. R.S. then stated that the day of the crossing, an individual named Bunty, who
4 R.S. described as a Sikh with a beard, picked up R.S. and the two other individuals that
5 had been apprehended with him. R.S. stated that he had received the information for Bunty
6 when he was in India from a family friend. R.S. stated he had no final destination in the
7 United States.

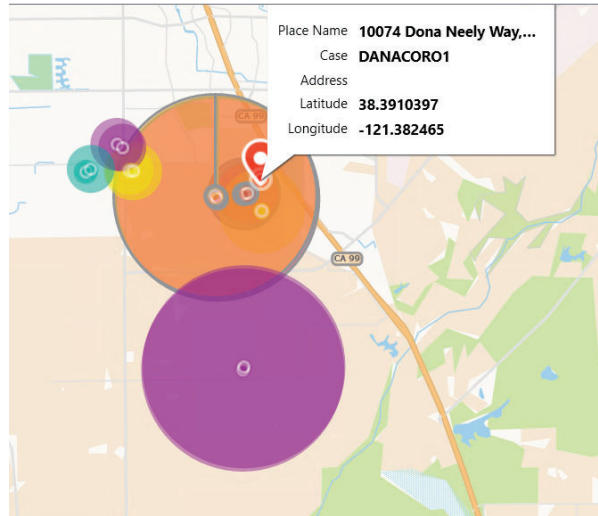
8 254. On April 28, 2022, M.P. was interviewed by BPA-I Singh and BPA-I
9 Marroquin. Agents advised M.P. that the interview was being audio recorded. Patel stated
10 that he was born and raised in Gandhinagar, Gujrat, India. M.P. said he departed Gujrat to
11 Abu Dhabi Airport, on April 20, 2022, and ultimately entered Canada at Toronto
12 International Airport. M.P. stated that he stayed at a hotel for two days. M.P. stated he got
13 taxi service from the front desk at the Toronto hotel to go to Vancouver. M.P. stated that it
14 took him a day and a half and cost \$1,000 CDN to travel from Toronto to Vancouver via
15 taxi. M.P. stated that he walked around downtown Vancouver until he found a house for
16 rent for two nights, paying \$200 per night. M.P. stated that he then walked from downtown
17 Vancouver to the U.S. - Canada International border (approximately 38 miles) in two
18 hours.

19 255. After initial processing, Border Patrol agents attempted to conduct an
20 interview with D.P. However, D.P. declined to answer questions relating to the
21 circumstances of his unlawful entry into the United States.

22 **April 27, 2022, Smuggling Event GPS Locations for TT1-TT6**

23 256. During the smuggling event that occurred on April 27, 2022, all six of the
24 phones were active and sending location data. Each of the devices registered either 27 or
25 28 pings from 9:00 p.m., April 27, 2022, through 4:00 a.m., April 28, 2022. As detailed in
26 the below exhibit, approximately 147 out of the 167 pings that occurred during that time
27 registered within the radius (ranging from 719 meters to 2278 meters) of the Elk Grove
28 Residence. The other pings are located within the greater Elk Grove area, but the location

information provided by the respective provider(s) placed the device outside of the radius of the Elk Grove Residence. Based upon the investigation to date, to include the GPS data relating to TT1-TT6 as detailed in this paragraph, it is my belief that the April 27, 2022, smuggling event was coordinated out of the Elk Grove Residence.



Q. Identification of New Cell Phone (TT7) Used by GILL

257. On May 4, 2022, at approximately 9:08 p.m., CS-2 received the following text from a WhatsApp Account with (360) 778-9649 as the account number, “Bhai ji save this number please.”

258. On May 9, 2022, at approximately 10:47 a.m., CS-2 placed a WhatsApp call to the WhatsApp account with (360) 778-9649 as the account number (hereinafter the “TT7 WhatsApp Account”). The call was recorded and was approximately two minutes and forty-five seconds in duration. During that call, CS-2 confirmed that the user of the TT7 WhatsApp Account was GILL.

259. According to records provided by AT&T on May 16, 2022, TT7 was activated on May 4, 2022. According to these records, the listed subscriber for TT7 is “PREPAID CUSTOMER” with a user address “123 YOUR STREET, YOUR TOWN, GA 98226.” The records further indicate that the account was opened on May 4, 2022, *i.e.*, the day GILL texted CS-2 the new number.

R. Recent Surveillance of GILL at the Elk Grove Residence and the Galt Residence

260. On May 3, 2022, HSI Sacramento SA Craig Squire conducted surveillance at the Elk Grove Residence. SA Squire arrived at approximately 4:15 p.m. and observed a silver Honda, bearing California license plate 8TQS309, parked in the driveway. SA Squire conducted record checks and this vehicle is registered to Daljit KAUR at the Elk Grove Residence.

261. On May 4, 2022, SA Squire again conducted surveillance at the Elk Grove Residence. SA Squire arrived at approximately 9:30 a.m. and no vehicles were observed at the residence. At approximately 10:27 a.m., a beige-colored BMW sedan pulled into the driveway and proceeded through the gate to the garage which is in the rear. SA Squire drove by the Elk Grove Residence and observed that the BMW was parked in the garage with the door up. The vehicle had a personalized California license plate that began with "IL," however, the rest of the license plate was obscured.

262. At approximately 12:48 p.m., the silver Honda seen the previous day pulled into the driveway. An unidentified male wearing a hooded sweatshirt exited the vehicle and entered the residence through the front door. At approximately 2:09 p.m. the BMW backed out of the driveway and drove out of SA Squire's view.

263. At approximately 2:40 p.m., the BMW returned and parked in the garage. After the BMW parked, and after having not observed GILL at the Elk Grove Residence, SA Squire went to the Galt Residence. When SA Squire arrived at the Galt Residence, an updated phone ping showed that GILL was headed north toward the Elk Grove Residence. SA Squire then returned to the Elk Grove Residence. Upon arriving at the Elk Grove Residence at approximately 3:42 p.m., SA Squire observed the Armada now parked in the driveway.

264. On May 10, 2022, HSI Sacramento SAs Craig Squire and Michael Barge drove by the Elk Grove Residence to take photographs of the residence. Upon arriving at the Elk Grove Residence, SAs Squire and Barge observed the Armada parked in the

1 driveway. As SA Squire and Barge were driving past the Elk Grove Residence, they
2 observed GILL walking through the courtyard, behind the gate, and headed toward the
3 main residence.

4 265. On May 9, 2022, SA Squire drove to the Galt Residence to conduct
5 surveillance. SA Squire arrived at approximately 2:00 p.m. and parked in an area with a
6 view of the front gate of the residence.

7 266. At approximately 2:15 p.m., SA Squire observed the Armada pull into the
8 driveway of the residence, enter through the gate, and park near the garage on the north
9 side of the Galt Residence. Before the vehicle turned south on Marengo Road, SA Squire
10 had a clear view of the driver and positively identified him as GILL based on recent photos
11 GILL that SA Squire had been provided. SA Squire observed GILL open the rear tailgate
12 of the Armada and make two trips carrying bags into the Galt Residence.

13 **KNOWLEDGE BASED ON TRAINING AND EXPERIENCE**

14 267. Based on my training and experience, I know each cellular device has one or
15 more unique identifiers embedded inside it. Depending on the cellular network and the
16 device, the embedded unique identifiers for a cellular device could take several different
17 forms, including an Electronic Serial Number (ESN), a Mobile Electronic Identity Number
18 (MEIN), a Mobile Identification Number (MIN), a Subscriber Identity Module (SIM), a
19 Mobile Subscriber Integrated Services Digital Network Number (MSISDN), an
20 International Mobile Subscriber Identifier (IMSI), or an International Mobile Equipment
21 Identity (IMEI). The unique identifiers -- as transmitted from a cellular device to a cellular
22 antenna or tower -- can be recorded by pen-traps and indicate the identity of the cellular
23 device making the communication without revealing the communication's content.

24 268. Based on my training and experience, I know that when a cell phone connects
25 to a cellular antenna or tower, it reveals its embedded unique identifiers to the cellular
26 antenna or tower, and the cellular antenna or tower records those identifiers as a matter of
27 course. The unique identifiers -- as transmitted from a cell phone to a cellular antenna or
28 tower -- are like the telephone number of an incoming call. They can be recorded by pen-

1 trap devices and indicate the identity of the cell phone device making the communication
2 without revealing the communication's content. In addition, a list of incoming and
3 outgoing telephone numbers is generated when a cell phone is used to make or receive
4 calls, or to send or receive text messages (which may include photographs, videos, and
5 other data). These telephone numbers can be recorded by pen-trap devices and then used
6 to identify the parties to a communication without revealing the communication's contents.

7 269. Based my training and experience, I know that a cell phone can also be used
8 to exchange text messages with email accounts. The email addresses associated with those
9 text messages can be recorded by pen-trap devices and then used to identify parties to a
10 communication without revealing the communication's contents.

11 270. Based on my training and experience, I know that cellular phones can
12 connect to the internet via a cellular network. When connecting through a cellular network,
13 internet communications sent and received by the cellular phone each contain the same
14 unique identifier that identifies cellular voice communications, such as an ESN, MEIN,
15 MIN, SIM, IMSI, MSISDN, or IMEI. Internet communications from a cellular phone also
16 contain the IP address associated with that cellular phone at the time of the communication.
17 Each of these unique identifiers can be used to identify parties to a communication without
18 revealing the communication's contents.

19 271. In my training and experience, I have learned that AT&T and Verizon are
20 companies that provide cellular telephone access to the general public. I also know that
21 certain providers of cellular telephone service have technical capabilities that allow them
22 to collect and generate information about the locations of the cellular telephones to which
23 they provide service, including E-911 Phase II data (also known as GPS data or latitude-
24 longitude data) and cell-site data (also known as "tower/face information" or cell
25 tower/sector records). E-911 Phase II data provides relatively precise location information
26 about the cellular telephone itself, either via GPS tracking technology built into the phone
27 or by triangulating on the device's signal using data from several of the provider's cell
28 towers. Cell-site data identifies the cell towers (*i.e.*, antenna towers covering specific

1 geographic areas) that received a radio signal from the cellular telephone and, in some
2 cases, the “sector” (*i.e.*, faces of the towers) to which the telephone connected. These
3 towers are often a half-mile or more apart, even in urban areas, and can be 10 or more miles
4 apart in rural areas. Furthermore, the tower closest to a wireless device does not necessarily
5 serve every call made to or from that device. Accordingly, cell-site data is typically less
6 precise than E-911 Phase II data.

7 272. Based on my training and experience, I know that AT&T and Verizon can
8 collect E-911 Phase II data about the location of the Target Telephones, including by
9 initiating a signal to determine the location of the Target Telephones on their networks or
10 with such other reference points as may be reasonably available.

11 273. When using a cellular connection to receive or transmit data, a cellular phone
12 typically utilizes a cell tower to make telephone calls, send or receive text messages, send
13 or receive emails, surf the internet, carry out application-initiated data transfers, among
14 other things.

15 274. Based on my training and experience, I know that AT&T and Verizon can
16 collect cell-site data about Target Telephones. Based on my training and experience, I
17 know that for each communication (including data connections) a cellular device makes,
18 its wireless service provider can typically determine: (1) the date and time of the
19 communication; (2) the telephone numbers involved, if any; (3) the cell tower to which the
20 customer connected at the beginning of the communication; (4) the cell tower to which the
21 customer connected at the end of the communication; and (5) the duration of the
22 communication. I also know that wireless providers such as AT&T and Verizon typically
23 collect and retain cell-site data pertaining to cellular devices to which they provide service
24 in their normal course of business in order to use this information for various business-
25 related purposes.

26 275. Different service providers use different systems, applications, and reports to
27 collect or analyze cell site data. These systems, applications, and reports are referred to by
28 a variety of names including, but not limited to real-time tool or “RTT” (Verizon), Periodic

1 Location Updates or “PLU” (Verizon), per call measurement data or “PCMD” (Sprint),
2 Location Database of Record or “LOCDBOR” (AT&T), EVDO, ALULTE, Timing
3 Advance and True Call (T-Mobile/Sprint/US Cellular/GCI). RTT data, for example,
4 estimates the approximate distance of the cellular device from a cellular tower based upon
5 the speed with which signals travel between the device and the tower. This information can
6 be used to estimate an approximate location range that is more precise than typical cell-site
7 data.

8 276. Based on my training and experience, I know that wireless providers such as
9 AT&T and Verizon typically collect and retain information about their subscribers in their
10 normal course of business. This information can include basic personal information about
11 the subscriber, such as name and address, and the method(s) of payment (such as credit
12 card account number) provided by the subscriber to pay for wireless communication
13 service. I also know that wireless providers such as AT&T and Verizon typically collect
14 and retain information about their subscribers’ use of the wireless service, such as records
15 about calls or other communications sent or received by a particular device and other
16 transactional records, in their normal course of business. In my training and experience,
17 this information may constitute evidence of the crimes under investigation because the
18 information can be used to identify the Target Telephone’s user or users and may assist in
19 the identification of co-conspirators and/or victims.

20 277. Modern cell phones allow users to switch their telephone numbers, use
21 multiple telephone numbers on a single device, and transfer their telephone number to a
22 different cell phone. These changes can be made with the assistance of the wireless
23 provider or by taking actions such as changing the “SIM card” (short for “subscriber
24 identity module card”) of a cellphone. To provide for any such changes made to the Target
25 Telephones, Attachments A1-A2 specify that the property to be searched includes: (i) any
26 instrument to which the listed target telephone number was assigned within the last 30
27 days, and that now has been assigned a changed telephone number, (ii) any changed
28 telephone number assigned to an instrument now bearing the same unique identifying

1 number (such as an IMSI, ESN, MSID, or IMEI) as the telephone number listed above, or
2 that was bearing the same unique identifying number as the telephone number listed above,
3 at any point within the last 30 days, (iii) any changed unique identifying number
4 subsequently assigned to the same telephone number, or (iv) any additional changed
5 telephone number and/or unique identifying number, whether the changes occur
6 consecutively or simultaneously, listed to the same subscriber and wireless telephone
7 account number as the telephone numbers listed above, within the period of disclosure
8 authorized by this warrant.

9 **AUTHORIZATION REQUEST FOR TARGET TELEPHONES**

10 278. Based on the fact set forth in this affidavit, there is probable cause to
11 conclude that violations of 8 U.S.C. §§ 1324(a)(1)(A)(i)-(iii), (v)(I) and (a)(2)(B)(ii),
12 Bringing in and Harboring Certain Aliens, and Conspiracy to commit such offenses, and
13 18 U.S.C. §§ 1956(a)(1), and (h), Laundering of, and Conspiracy to Launder, Monetary
14 Instruments, have been committed, are being committed, and will be committed by users
15 of the target telephone(s) and others who are known and unknown. The requested
16 information, including prospective location information, for the target telephone(s) will
17 help law enforcement monitor the user(s) of the target telephone(s), follow their
18 movements when they are at locations that are otherwise hard for law enforcement to
19 observe, and identify other coconspirators, sources of supply, storage locations, and other
20 people and places of evidentiary value. There is probable cause to believe that the use of
21 the investigative technique described by the warrant will result in officers learning that
22 identifying information.

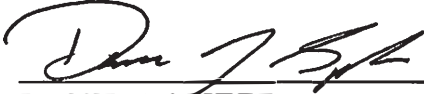
23 279. Based on the foregoing, I request that the Court issue the proposed search
24 warrant pursuant to Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 2703(c).

25 280. I further request that the Court direct AT&T and Verizon to disclose to the
26 government any information described in Attachments B1-B2 that is within the possession,
27 custody, or control of AT&T and Verizon. I also request that the Court direct AT&T and
28 Verizon to furnish the government all information, facilities, and technical assistance

1 necessary to accomplish the collection of the information described in Attachments B1-B2
2 unobtrusively and with a minimum of interference with AT&T or Verizon's services,
3 including by initiating a signal to determine the location of the Target Telephone(s) on
4 AT&T or Verizon's network or with such other reference points as may be reasonably
5 available, and at such intervals and times directed by the government. The agency shall
6 reasonably compensate AT&T and Verizon for reasonable expenses incurred in furnishing
7 such facilities or assistance.

8 281. Pursuant to 18 U.S.C. § 2703(g), the government will execute these warrants
9 by serving the warrants on AT&T or Verizon. Because the warrants will be served on
10 AT&T or Verizon, who will then compile the requested records and data, reasonable cause
11 exists to permit the execution of the requested warrant at any time in the day or night. I
12 therefore request that the Court authorize execution of the warrant at any time of day or
13 night, owing to the potential need to locate the Target Telephone(s) outside of daytime
14 hours.

15 282. This warrant is being submitted via reliable electronic means. Fed. R. Crim.
16 P. 4.1 & 41(d)(3).

17
18 
19 _____
20 DAVID J. SPITZER
21 Special Agent,
22 Homeland Security Investigations

23 The above-named agent provided a sworn statement to the truth of the foregoing
24 affidavit by telephone on this 20th day of May, 2022.

25 
26 _____
27 HON. BRIAN A. TSUCHIDA
28 United States Magistrate Judge

ATTACHMENT A1

Property to Be Searched and Subscriber/Subject Information

1. Records and information associated with the cellular phone assigned call number:

a. (916) 616-2319 (hereinafter “**Target Telephone 1**” or “**TT1**”). **TT1** is a cellular telephone with International Mobile Subscriber Identity (IMSI) 311480380560254, with subscriber “Info Update,” at 295 Parkshore Drive, Folsom, CA, with service provided by Verizon, a wireless telephone service provider headquartered at 180 Washington Valley Road, Bedminster, NJ 07921.

The subscriber/customer of the Target Cell Phone is unknown. The identity of the person who is the subject of the criminal investigation is Jaspal GILL, aka Rajinder Pal SINGH.

2. The Target Cell Phone (**TT1**).

3. The property to be searched includes: (i) any instrument to which the listed target telephone number was assigned within the last 30 days, and that now has been assigned a changed telephone number, (ii) any changed telephone number assigned to an instrument now bearing the same unique identifying number (such as an IMSI, ESN, MSID, or IMEI) as the telephone number listed above, or that was bearing the same unique identifying number as the telephone number listed above, at any point within the last 30 days, (iii) any changed unique identifying number subsequently assigned to the same telephone number, or (iv) any additional changed telephone number and/or unique identifying number, whether the changes occur consecutively or simultaneously, listed to the same subscriber and wireless telephone account number as the telephone numbers listed above, within the period of disclosure authorized by this warrant.

ATTACHMENT B1**Particular Things to be Seized**

This warrant is issued pursuant to Rule 41 of the Federal Rules of Criminal Procedure and the Electronic Communications Privacy Act (ECPA), 18 U.S.C. §§ 2701. As such, this warrant authorizes the collection of subscriber records, cell site data, and prospective E-911/GPS and cell site triangulation information regarding the Target Cell Phones. **This warrant does not authorize the disclosure or seizure of any tangible property or the content of any wire or electronic communication, as defined in 18 U.S.C. § 2510(8).** Accordingly, the Court finds reasonable necessity for the seizure of the data and records identified below. *See* 18 U.S.C. § 3103a(b)(2).

I. Section I: Information to be Disclosed by Verizon

1. **Subscriber/Account Information.** The following non-content information about the customers or subscribers associated with the Account listed in Attachment A1:

- a. Names (including subscriber names, user names, and screen names);
- b. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
- c. Local and long distance telephone connection records from **April 1, 2022, through May 20, 2022;**
- d. Records of session times and durations, and the temporarily assigned network addresses (such as Internet Protocol (IP) addresses) associated with those sessions from **April 1, 2022, through May 20, 2022;**
- e. Length of service (including start date) and types of service utilized;
- f. Telephone or instrument numbers (including MAC addresses, Electronic Serial Numbers (ESN), Mobile Electronic Identity Numbers (MEIN), Mobile Equipment Identifiers (MEID), Mobile Identification Numbers (MIN), Subscriber Identity Modules (SIM), Mobile Subscriber Integrated Services Digital Network Numbers

(MSISDN), International Mobile Subscriber Identity Identifiers (IMSI), or International Mobile Equipment Identities (IMEI);

g. Other subscriber numbers or identities (including the registration Internet Protocol (IP) address); and

h. Means and source of payment for such service (including any credit card or bank account number) and billing records.

2. Historical Cell Site Location Information.

a. All records and other information (**not including the contents of communications**) relating to wire and electronic communications sent or received by the Account from **April 1, 2022, through May 20, 2022**, including:

i. the date and time of the communication, the method of the communication, and the source and destination of the communication (such as the source and destination telephone numbers (call detail records), email addresses, and IP addresses);

ii. historical cell site information regarding the cell tower and antenna face (also known as “sectors”) through which the communications were sent and received. This information is to be provided irrespective of the application, name, or report utilized by Verizon. Accordingly, this information includes the following data sets to the extent that they are collected by Verizon: RTT, PLU, PCMD, LOCDBOR, EVDO, True Call, ALULTE, and Timing Advance.

b. The physical address and coverage maps of cell towers used by the Target Cell Phone(s).

3. Prospective Cell Site Location Information.

a. All information about the location of the Target Cell Phone(s) described in Attachment A1 for **a period of 45 days**, during all times of day and night. This information includes: precise location information, as well as all data about which “cell towers” (*i.e.*, antenna towers covering specific geographic areas) and “sectors” (*i.e.*, faces of the towers) received a radio signal from the cellular telephone(s) or account(s) described in Attachment A1. This information also includes the following data sets to the

1 extent that they are collected by Verizon: RTT, PLU, PCMD, LOCDBOR, EVDO, True
2 Call, ALULTE, and Timing Advance.

3 b. The physical address and coverage maps of cell towers used by the
4 Target Cell Phone(s).

5 **4. Prospective E-911/GPS and Cell Site Triangulation Information.**

6 a. All information about the location of the Target Cell Phone(s)
7 described in Attachment A1 for **a period of 45 days**, during all times of day and night.
8 This information includes: all available E-911 Phase II data, GPS data, latitude-longitude
9 data, and other precise location information, as well as all data about which “cell towers”
10 (*i.e.*, antenna towers covering specific geographic areas) and “sectors” (*i.e.*, faces of the
11 towers) received a radio signal from the cellular telephone(s) or account(s) described in
12 Attachment A1.

13 b. The physical address and coverage maps of cell towers used by the
14 Target Cell Phone(s).

15 To the extent that the location information described in the previous paragraphs
16 (hereinafter, “Location Information”) is within the possession, custody, or control of
17 Verizon, Verizon is required to disclose the Location Information to the government
18 pursuant to this warrant. In addition, pursuant to 18 U.S.C. §§ 3123(b)(2) and 3124(a)-(b),
19 Verizon must furnish the government all information, facilities, and technical assistance
20 necessary to accomplish the collection of the Location Information unobtrusively and with
21 a minimum of interference with Verizon’s services. The government shall compensate
22 Verizon for reasonable expenses incurred in furnishing such facilities or assistance.

23 **II. Section II: Information to Be Seized by the Government**

24 1. All information described above in Section I that constitutes evidence of
25 violations of 8 U.S.C. §§ 1324(a)(1)(A)(i)-(iii) and (a)(2)(B)(ii), Alien Smuggling, and 18
26 U.S.C. §§ 1956(a)(1), and (h), Laundering of, and Conspiracy to Launder, Monetary
27 Instruments involving Jaspal GILL, aka, Rajinder SINGH, and/or previously unidentified
28 subject(s).

1 2. All non-content subscriber/account information provided pursuant to 18
2 U.S.C. § 2703(c).

3 3. Location Information regarding the Target Cell Phone(s).

4 Law enforcement personnel (who may include, in addition to law enforcement
5 officers and agents, attorneys for the government, attorney support staff, agency personnel
6 assisting the government in this investigation, and outside technical experts under
7 government control) are authorized to review the records produced by Verizon in order to
8 locate the things particularly described in this Warrant.

ATTACHMENT A2

Property to Be Searched and Subscriber/Subject Information

1. Records and information associated with the cellular phone assigned call number:

a. (253) 750-1721 (hereinafter “**Target Telephone 4**” or “**TT4**”). TT4 is a cellular telephone with International Mobile Subscriber Identity (IMSI) 310410206907647, with subscriber “PREPAID CUSTOMER,” at 123 Your Street, Your Town, GA 98022, with service provided by AT&T, a wireless telephone service provider headquartered at 11760 U.S. Highway 1, North Palm Beach, FL 33408.

The subscriber/customer of the Target Cell Phone is unknown. The identity of the person who is the subject of the criminal investigation is Jaspal GILL, aka Rajinder Pal SINGH.

b. (360) 778-9649 (hereinafter “**Target Telephone 7**” or “**TT7**”). TT7 is a cellular telephone with International Mobile Subscriber Identity (IMSI) 310410370678979, with subscriber “PREPAID CUSTOMER,” at 123 Your Street, Your Town, GA 98409, with service provided by AT&T, a wireless telephone service provider headquartered at 11760 U.S. Highway 1, North Palm Beach, FL 33408.

The subscriber/customer of the Target Cell Phone is unknown. The identity of the person who is the subject of the criminal investigation is Jaspal GILL, aka Rajinder Pal SINGH.

1. The Target Cell Phones (**TT4, TT7**).

2. The property to be searched includes: (i) any instrument to which the listed target telephone number was assigned within the last 30 days, and that now has been assigned a changed telephone number, (ii) any changed telephone number assigned to an instrument now bearing the same unique identifying number (such as an IMSI, ESN, MSID, or IMEI) as the telephone number listed above, or that was bearing the same unique identifying number as the telephone number listed above, at any point within the last 30 days, (iii) any changed unique identifying number subsequently assigned to the same

1 telephone number, or (iv) any additional changed telephone number and/or unique
2 identifying number, whether the changes occur consecutively or simultaneously, listed to
3 the same subscriber and wireless telephone account number as the telephone numbers listed
4 above, within the period of disclosure authorized by this warrant.
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ATTACHMENT B2**Particular Things to be Seized**

This warrant is issued pursuant to Rule 41 of the Federal Rules of Criminal Procedure and the Electronic Communications Privacy Act (ECPA), 18 U.S.C. §§ 2701. As such, this warrant authorizes the collection of subscriber records, cell site data, and prospective E-911/GPS and cell site triangulation information regarding the Target Cell Phones. This warrant does not authorize the disclosure or seizure of any tangible property or the content of any wire or electronic communication, as defined in 18 U.S.C. § 2510(8). Accordingly, the Court finds reasonable necessity for the seizure of the data and records identified below. See 18 U.S.C. § 3103a(b)(2).

I. Section I: Information to be Disclosed by AT&T

1. **Subscriber/Account Information.** The following non-content information about the customers or subscribers associated with the Account listed in Attachment A2:

- a. Names (including subscriber names, user names, and screen names);
- b. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
- c. Local and long distance telephone connection records from **April 1, 2022, through May 20, 2022;**
- d. Records of session times and durations, and the temporarily assigned network addresses (such as Internet Protocol (IP) addresses) associated with those sessions from **April 1, 2022, through May 20, 2022;**
- e. Length of service (including start date) and types of service utilized;
- f. Telephone or instrument numbers (including MAC addresses, Electronic Serial Numbers (ESN), Mobile Electronic Identity Numbers (MEIN), Mobile Equipment Identifiers (MEID), Mobile Identification Numbers (MIN), Subscriber Identity Modules (SIM), Mobile Subscriber Integrated Services Digital Network Numbers

(MSISDN), International Mobile Subscriber Identity Identifiers (IMSI), or International Mobile Equipment Identities (IMEI);

g. Other subscriber numbers or identities (including the registration Internet Protocol (IP) address); and

h. Means and source of payment for such service (including any credit card or bank account number) and billing records.

2. Historical Cell Site Location Information.

a. All records and other information (**not including the contents of communications**) relating to wire and electronic communications sent or received by the Account from **April 1, 2022, through May 20, 2022**, including:

i. the date and time of the communication, the method of the communication, and the source and destination of the communication (such as the source and destination telephone numbers (call detail records), email addresses, and IP addresses);

ii. historical cell site information regarding the cell tower and antenna face (also known as “sectors”) through which the communications were sent and received. This information is to be provided irrespective of the application, name, or report utilized by AT&T. Accordingly, this information includes the following data sets to the extent that they are collected by AT&T: RTT, PLU, PCMD, LOCDBOR, EVDO, True Call, ALULTE, and Timing Advance.

b. The physical address and coverage maps of cell towers used by the Target Cell Phone(s).

3. Prospective Cell Site Location Information.

a. All information about the location of the Target Cell Phone(s) described in Attachment A2 for **a period of 45 days**, during all times of day and night. This information includes: precise location information, as well as all data about which “cell towers” (*i.e.*, antenna towers covering specific geographic areas) and “sectors” (*i.e.*, faces of the towers) received a radio signal from the cellular telephone(s) or account(s) described in Attachment A2. This information also includes the following data sets to the

1 extent that they are collected by AT&T: RTT, PLU, PCMD, LOCDBOR, EVDO, True
2 Call, ALULTE, and Timing Advance.

3 b. The physical address and coverage maps of cell towers used by the
4 Target Cell Phone(s).

5 **4. Prospective E-911/GPS and Cell Site Triangulation Information.**

6 a. All information about the location of the Target Cell Phone(s)
7 described in Attachment A2 for **a period of 45 days**, during all times of day and night.
8 This information includes: all available E-911 Phase II data, GPS data, latitude-longitude
9 data, and other precise location information, as well as all data about which “cell towers”
10 (*i.e.*, antenna towers covering specific geographic areas) and “sectors” (*i.e.*, faces of the
11 towers) received a radio signal from the cellular telephone(s) or account(s) described in
12 Attachment A2.

13 b. The physical address and coverage maps of cell towers used by the
14 Target Cell Phone(s).

15 To the extent that the location information described in the previous paragraphs
16 (hereinafter, “Location Information”) is within the possession, custody, or control of
17 AT&T, AT&T is required to disclose the Location Information to the government pursuant
18 to this warrant. In addition, pursuant to 18 U.S.C. §§ 3123(b)(2) and 3124(a)-(b), AT&T
19 must furnish the government all information, facilities, and technical assistance necessary
20 to accomplish the collection of the Location Information unobtrusively and with a
21 minimum of interference with AT&T’s services. The government shall compensate AT&T
22 for reasonable expenses incurred in furnishing such facilities or assistance.

23 **II. Section II: Information to Be Seized by the Government**

24 1. All information described above in Section I that constitutes evidence of
25 violations of 8 U.S.C. §§ 1324(a)(1)(A)(i)-(iii) and (a)(2)(B)(ii), Alien Smuggling, and 18
26 U.S.C. §§ 1956(a)(1), and (h), Laundering of, and Conspiracy to Launder, Monetary
27 Instruments involving Jaspal GILL, aka, Rajinder SINGH, and/or previously unidentified
28 subject(s).

1 2. All non-content subscriber/account information provided pursuant to 18
2 U.S.C. § 2703(c).

3 3. Location Information regarding the Target Cell Phone(s).

4 Law enforcement personnel (who may include, in addition to law enforcement
5 officers and agents, attorneys for the government, attorney support staff, agency personnel
6 assisting the government in this investigation, and outside technical experts under
7 government control) are authorized to review the records produced by AT&T in order to
8 locate the things particularly described in this Warrant.